

TSD File Inventory Index

Date: Oct. 4, 2006

Initial: C. A. Senechal

Facility Name: <u>T. W. T. Incorporated (As Filed Site)</u>		
Facility Identification Number: <u>110 097 179 204</u>		
A.1 General Correspondence		B.2 Permit Docket (B.1.2)
A.2 Part A / Interim Status		.1 Correspondence
.1 Correspondence		.2 All Other Permitting Documents (Not Part of the ARA)
.2 Notification and Acknowledgment		C.1 Compliance - (Inspection Reports)
.3 Part A Application and Amendments		C.2 Compliance/Enforcement
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications
.5 Change Under Interim Status Requests		.2 Import/Export Notifications
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment
.1 Correspondence		.1 RFA Correspondence
.2 Reports		.2 Background Reports, Supporting Docs and Studies
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos
.1 Correspondence		.4 PFA Reports
.2 Closure/Post Closure Plans, Certificates, etc		D. 2 Corrective Action/Facility Investigation
A.5 Ambient Air Monitoring		.1 RFI Correspondence
.1 Correspondence		.2 RFI Workplan
.2 Reports		.3 RFI Program Reports and Oversight
B.1 Administrative Record		.4 RFI Draft /Final Report

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater	✓	D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3006(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: *On field site*

**C.2 Compliance
And Enforcement**

11/13/01

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

PEOPLE OF THE STATE OF ILLINOIS,
ex rel. JAMES E. RYAN, Attorney
General of the State of Illinois,

Plaintiff,

v.

I.W.I. INCORPORATED, an Illinois
Corporation, and PAMELA WELLMAN,
personal representative of the GLENN
WELLMAN estate,

Defendants.

Cal 6

No. 97 CH 06138

CONSENT ORDER

Plaintiff, PEOPLE OF THE STATE OF ILLINOIS, ex rel. JAMES E. RYAN, Attorney General of the State of Illinois, the Illinois Environmental Protection Agency ("Illinois EPA"), and the Defendants I.W.I. INCORPORATED, ("I.W.I.") an Illinois corporation, and PAMELA WELLMAN, personal representative of the GLENN WELLMAN ("Wellman") estate, have agreed to the making of this Consent Order and submit it to this Court for approval. The parties agree that the statement of facts contained herein represents a fair summary of the evidence and testimony which would be introduced by the parties if a trial were held. The parties further stipulate that this statement of facts is made and agreed upon for purposes of settlement only and that neither the fact that a party has entered into this Consent Order, nor any of the facts stipulated herein, shall be introduced into evidence in this or any other proceeding except to enforce the terms thereof by the parties to this Consent Order or as otherwise provided herein.

I.

JURISDICTION

This Court has jurisdiction of the subject matter herein and of the parties consenting hereto pursuant to the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/1 et seq. (2000).

II.

AUTHORIZATION

The undersigned representatives for each party certify that they are fully authorized by the party whom they represent to enter into the terms and conditions of this Consent Order and to legally bind them to it.

III.

STATEMENT OF FACTS

A. PARTIES

1. On May 19, 1997, the Complaint for Injunction and Civil Penalties was filed on behalf of the People of the State of Illinois by ex rel. James E. Ryan, Attorney General of the State of Illinois, on his own motion and upon the request of the Illinois EPA, pursuant to Sections 43 and 42 (d) and (e) of the Act, 415 ILCS 5/43 and 42 (d) and (e) (1998), against I.W.I. and Wellman.

2. Wellman died in December 1999.

3. On June 18, 2001, an Amended Complaint for Injunction and Civil Penalties was filed, pursuant to leave of this Court, naming Pamela Wellman, personal representative of the Wellman estate, as a defendant ("the Estate").

4. The Illinois EPA is an administrative agency established in the executive branch of the State government by Section 4 of the Act, 415 ILCS 5/4 (2000), and charged, *inter alia*, with the duty of enforcing the Act.

5. At all times relevant to this action, Defendant I.W.I. was and is an Illinois Corporation doing business at premises located at 7738 West 61st Place, Summit, Cook County, Illinois (“site” or “facility”).

6. At all times relevant to the Amended Complaint, Defendant I.W.I. was engaged in the business of manufacturing stainless steel containers called totes, used to transport chemicals and chemical products. I.W.I. was also engaged in the repairing and cleaning of damaged totes. I.W.I.’s business is conducted in a multi-building commercial property.

7. At all times relevant to the Amended Complaint, Wellman was the president of I.W.I. and responsible for the day to day operation and activities at I.W.I., until his death in December 1999.

B. Site Description

At all times relevant to the Amended Complaint, I.W.I. has owned the facility located at 7738 West 61st Place, Summit, Cook County, Illinois.

C. Allegations of Non-Compliance

Plaintiff contends that the Defendants have violated the following provisions of the Act and the Illinois Board Waste Disposal (“Board”) regulations.

Count I: Operating a Hazardous Waste Storage Site Without a Permit - 415 ILCS 5/21 (f) (2000), and 35 Ill. Adm. Code 703.121 (a) and (b), 703.150 (a), 722.134 (a), 725.116 (a) and (b), 725.132, 725.134, 725.137, 725.151 (a) and 725.155

- Count II: Failure to Perform Hazardous and Special Waste Determinations - 415 ILCS 5/21 (i) (2000) and 35 Ill. Adm. Code 722.111 and 808.121 (a)
- Count III: Unpermitted Disposal of Special Waste - 415 ILCS 5/21 (e) (2000) and 35 Ill. Adm. Code 808.121 (c)
- Count IV: Open Dumping - 415 ILCS 5/21 (a) (2000)
- Count V: Causing or Allowing Litter - 415 ILCS 5/21 (p) (1)

D. Admission of Violations

Defendants admit the violations of the Act and the Board Waste Disposal regulations cited in the Plaintiff's Amended Complaint.

E. Future Use

This Consent Order may be used against the Defendants in any subsequent enforcement action as evidence of a past adjudication of violation of the Act and the regulations promulgated thereunder, for purposes of Sections 39 (i) and/or 42 (h) of the Act, 415 ILCS 5/39 (i) and 5/42 (h) (2000).

IV.

APPLICABILITY

This Consent Order shall apply to and be binding upon the Plaintiff and the Defendants, and any officer, director, agent, employee or servant of the Defendants, as well as any successors or assigns of the Defendants. The Defendants shall not raise as a defense to any enforcement action taken pursuant to this Consent Order the failure of any of its officers, directors, agents, servants or employees to take such action as shall be required to comply with the provisions

of this Consent Order.

V.

COMPLIANCE WITH OTHER LAWS AND REGULATIONS

This Consent Order in no way affects the responsibilities of the Defendants to comply with any other federal, state or local laws or regulations, including but not limited to the Act, 415 ILCS 5/1 et seq. (2000), and the Board regulations, 35 Ill. Adm. Code, subtitles A through H.

VI.

VENUE

The parties agree that the venue of any action commenced in the circuit court for the purposes of interpretation and enforcement of the terms and conditions of this Consent Order shall be in Cook County, Illinois.

VII.

SEVERABILITY

It is the intent of the parties hereto that the provisions of this Consent Order shall be severable, and should any provision be declared by a court of competent jurisdiction to be inconsistent with state and federal law, and therefore unenforceable, the remaining clauses shall remain in full force and effect. In the event that any provision of this Consent Order shall be declared inconsistent with provisions of the Act, 415 ILCS 5/1 et seq. (2000), the provisions of the Act shall be controlling.

VIII.

JUDGMENT ORDER

This court, having jurisdiction over the parties and subject matter, the parties having

appeared, due notice having been given, the court having considered the stipulated facts and being advised in the premises, the Court finds the following relief appropriate:

IT IS HEREBY ORDERED, ADJUDGED AND DECREED:

A. Penalty

1. The assets of I.W.I. consist of the real property located at 7738 West 61st Place, Summit, Cook County, Illinois, and referred to herein as the site or facility. The assets of the Wellman estate consist of one account with the Charles Schwab brokerage firm ("Charles Schwab") with the approximate value of Eighty Three Thousand Dollars (\$83,000.00). All the proceeds of this account, after attorneys fees, as set forth below, shall be paid by the Estate as a penalty in this case. Payment shall be made as follows:

a. Upon the entry of this Consent Order, the Defendants shall, within ten (10) days of entry, provide Charles Schwab with a copy of this Order. Charles Schwab shall make the following disbursements out of the Wellman account within thirty (30) days of receiving a copy of the Consent Order:

- i. A check in the amount of Ten Thousand Dollars (\$10,000.00), shall be made payable to Robert V. Borla, Borla, North & Associates, and sent to Robert Borla at 6912 South Main Street, Suite 200, Downers Grove, Illinois, 60516-3447;
- ii. A check in the amount of Four Thousand Dollars (\$4000.00) shall be made payable to James D. Brusslan, and sent to James Brusslan at 150 North Wacker Drive, Suite 3000, Chicago, Illinois 60606; and
- iii. A certified check or money order for the entire remaining balance in the

account shall be made payable to the Illinois Environmental Protection Agency for deposit into the Hazardous Waste Fund and shall be sent by first class mail and delivered to:

Illinois Environmental Protection Agency
Fiscal Services
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

b. All payments shall be made within thirty (30) days of Charles Schwab receiving a copy of the Consent Order. Defendants' are responsible for ensuring that all payments are made by Charles Schwab. The name and case number, and the Estate's Identification Number 36-7366505, shall appear on the face of the certified check or money order. A copy of the certified check or money order and the transmittal letter shall be sent to:

Kelly A. O'Connor
Assistant Attorney General
Environmental Bureau
188 West Randolph Street, 20th Floor
Chicago, IL 60601

B. Interest on Penalties

1. Pursuant to Section 42(g) of the Act, 415 ILCS 5/42(g) (2000), interest shall accrue on any penalty amount owed by the Estate not paid within the time prescribed herein, at the maximum rate allowable under Section 1003(a) of the Illinois Income Tax Act, 35 ILCS 5/1003(a)(2000).

a. Interest on unpaid penalties shall begin to accrue from the date the penalty payment is due and continue to accrue to the date payment is received.

b. Where partial payment is made on any payment amount that is due, such partial

payment shall be first applied to any interest on unpaid penalties then owing.

c. All interest on penalties owed the Plaintiff shall be paid by certified check payable to the Illinois Environmental Protection Agency for deposit in the Hazardous Waste Fund at the above-indicated address. The name and number of the case and Defendant's FEIN shall appear on the face of the check. A copy of the check and the transmittal letter shall be sent to:

Kelly A. O'Connor
Assistant Attorney General
Environmental Bureau
188 West Randolph Street, 20th Floor
Chicago, IL 60601

C. Right of Entry

In addition to any other authority, the Illinois EPA, its employees and representatives and the Attorney General, his agents and representatives, shall have the right of entry into and upon the property which is the subject of this Consent Order, at all reasonable times for the purposes of carrying out inspections. In conducting such inspections, the Illinois EPA, its employees and representatives and the Attorney General, his employees and representatives may take photographs, samples, and collect information, as they deem necessary.

D. Cease and Desist

The Defendants shall cease and desist from future violations of the Act and Board regulations, including but not limited to, those Sections of the Act and Board regulations that were the subject matter of the Amended Complaint as outlined in Section III.C. of this Consent Order.

E. Release from Liability

In consideration of the Estate's payment of the penalty amount set forth herein, the

Plaintiff waives and discharges the Estate from further liability or penalties for violations of the Act and regulations which were the subject matter of the Amended Complaint herein, upon the payment of all monies owed. If additional funds become part of the Estate, these funds shall be paid into the Hazardous Waste Fund as set forth in Section VIII.A.1. within thirty (30) days of the funds becoming part of the Estate. Further, if additional assets of I.W.I. are discovered, such assets shall be liquidated, upon notice to and consent from the Plaintiff. Such liquidated assets shall be paid into the Hazardous Waste Fund as set forth in Section VIII.A.1. within thirty (30) days of the assets' discovery. Although the environmental violations have not been addressed at the facility, this case is dismissed against I.W.I., as the Plaintiff recognizes the impossibility of I.W.I. performing compliance work at the site. However, this Consent Order does not provide a release of liability to I.W.I. Further, nothing in this Consent Order shall be construed as a waiver by the Plaintiff of the right to redress future violations or obtain penalties with respect thereto.

F. Retention of Jurisdiction

This court shall retain jurisdiction of this matter for the purposes of interpreting and enforcing the terms and conditions of this Consent Order.

G. Enforcement of Consent Order

Upon the entry of this Consent Order, any party hereto, upon motion, may reinstate these proceedings solely for the purpose of enforcing the terms and conditions of this Consent Order. This Consent Order is a binding and enforceable order of the court and may be enforced as such through any and all available means.

WHEREFORE, the parties, by their representatives, enter into this Consent Order and submit it to the court that it may be approved and entered.

AGREED:

FOR THE PLAINTIFF

PEOPLE OF THE STATE OF ILLINOIS
ex rel. JAMES E. RYAN,
Attorney General of the
State of Illinois

MATTHEW J. DUNN, Chief
Environmental Enforcement/
Asbestos Litigation Division

BY: *Rosemarie Cazeau*
ROSEMARIE CAZEAU, Chief
Environmental Bureau
Assistant Attorney General

DATE: 11/15/01

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

BY: *Joseph E. Svobeda*
JOSEPH E. SVOBODA
Chief Legal Counsel

DATE: 11/13/01

FOR THE DEFENDANTS

PAMELA WELLMAN, PERSONAL
REPRESENTATIVE OF THE ESTATE

BY: *Pamela Wellman*

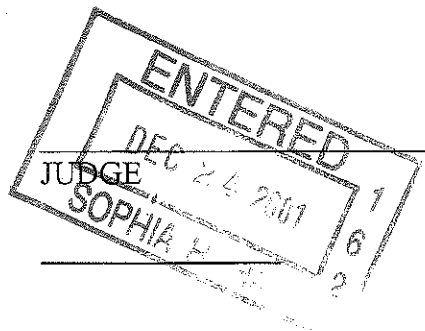
DATE: 12/17/01

I.W.I. INCORPORATED

*I.W.I. Inc. by Pamela Wellman
Personal Representative of the Estate
of James E. Ryan, 100% owner
shareholder of I.W.I.*
BY: *Pamela Wellman*
DATE: 12/17/01

ENTERED:

DATE:



State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/785-8604

December 1, 1994

RECEIVED
WMD RECORD CENTER

CERTIFIED MAIL

2105555791

DEC 15 1994

IWI Industries
Attn: Glen Wellman
7738 West 61st Place
Summit, Illinois 60501

RECEIVED

DEC 07 1994

Re: COMPLIANCE INQUIRY LETTER
0311740003 -- Cook County
IWI Industries
ILD097179204
Compliance File

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

Dear Mr. Wellman:

The purpose of this letter is to address the status of the above-referenced facility in relation to the requirements of the [Illinois] Environmental Protection Act and 35 Ill. Adm. Code Part 722, Subparts A through D; Part 725, Subparts A through E, I, and J; and Part 808, Subpart A and to inquire as to your position with respect to the apparent violations identified in Attachment A and your plans to correct these apparent violations. The Agency's findings of apparent non-compliance listed in Attachment A are based on an inspection completed on October 5, 1994. For your convenience a copy of the inspection report is enclosed with this letter.

Please submit in writing, within fifteen (15) calendar days of the date of this letter, the reasons for the identified violations, a description of the steps which have been taken to correct the violations and a schedule, including dates, by which each violation will be resolved. These resolution dates are not to exceed 60 days from the date of the above referenced inspection and/or record review. The written response, and two copies of all documents submitted in reply to this letter, should be sent to the following:

Deanne Virgin
Compliance Unit
Illinois Environmental Protection Agency
Bureau of Land #24
Post Office Box 19276
Springfield, Illinois 62794-9276

Please be advised that violations cited previously are currently outstanding. In addition, please be advised that this letter constitutes the notice required by Section 31(d) of the Illinois Environmental Protection Act prior to the filing of a formal complaint. The cited Section of the Illinois Environmental Protection Act requires the Agency to inform you of the charges which are to be alleged and offer you the opportunity to meet with appropriate officials within thirty days of this notice date in an effort to resolve such conflict which could lead to the filing of formal action.

100-100000

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APR 1 1964

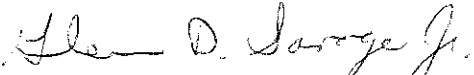
OFFICE OF ROYAL
NAVY REGION 1
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Page 2

Further, take notice that non-compliance with the requirements of the Illinois Environmental Protection Act and rules and regulations adopted thereunder may be the subject of enforcement action pursuant to either the Illinois Environmental Protection Act, 415 ILCS 5/1 et seq. or the federal Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sec. 6901 et seq.

If you have any questions regarding the above, please contact Tina Kovaszny at 708/338-7900.

Sincerely,


Glenn D. Savage, Jr., Manager
Field Operations Section
Division of Land Pollution Control
Bureau of Land

GDS:TMK:DV:dks/1528w, 62-63

cc: USEPA Region V

ATTACHMENT A

1. Pursuant to Section 21(p)(1) of the Illinois Environmental Protection Act, Ill. Rev. Stat., Ch. 111 1/2, Sec. 1001 et seq.; no person shall cause or allow the open dumping of any waste in a manner which results in litter.

You are in apparent violation of Section 21(p)(1) of the Act for the following reason(s): An area west of Building S is contaminated with what appears to be grease or oil. Two areas on the west wall of Building H are contaminated with materials migrating from Building G. The north area of Building P is saturated with grease or oil.

2. Pursuant to Section 21(a) of the Illinois Environmental Protection Act, Ill. Rev. Stat., Ch. 111 1/2, Sec. 1001 et seq. no person shall cause or allow the open dumping of any waste. You are in apparent violation of Section 21(a) of the Act for the following reason(s): An area west of Building S is contaminated with what appears to be grease or oil. Two areas on the west wall of Building H are contaminated with material migrating from Building G. The north area of Building P is saturated with grease or oil.

DV:dks/1528w, 64

File

APR 19 1994

RCRA INSPECTION REPORT

USEPA #: 11 0097179204 IEPA #: 0311740003

Facility Name: IWI Industries Phone #: 708-458-8700

Street Address: 7738 West 61st Place County: Cook

City: Summit State: IL Zip: 60501

Region: 2 Inspection Date: 1 / 11 / 94 From: 900 To: 950

Weather: 40° Sunny

TYPE OF FACILITY

Notified As: non-notifier	Regulated As: G.S
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LDF? Y HPV? N 90-Day F/U Required?: YES NO X

TYPE OF INSPECTION

CEI: ✓ Sampling: Citizen Complaint: Closed: Other:

CME/O&M: _____ Record Review: _____ Follow-Up to Inspection of: _____ Withdrawal: _____

NON-REGULATED STATUS N/A

SQG: Claimed Nonhandler: Other (Specify in Narrative):

PART A N/A

Notification Date: ____/____/____, from (initial) or (subsequent) Notification.

Initial Part A Date: ___/___/___ Amended: ___/___/___

Part A Withdrawal requested: ____/____/____ Approved by (US)(IL) EPA: ____/____/____

PART B PERMIT APPLICATION N/A

Part 8 Permit Submitted: Y or N ____/____/____ Final Permit Issued: ____/____/____

ENFORCEMENT

Has the firm been referred to — USEPA: Y or **(N)** ___/___/___

Illinois Attorney General: (Y) or N 8 / 19 / 85 County State's Attorney: (Y) or N 5 / 30 / 85

ORDERS ISSUED

CACO: ____/____/____ CAFO: ____/____/____ Consent Decree: ____/____/____

Federal Court Order: ___/___/___ State Court Order: 11⁸/10¹⁹/85 IPCB Order: ___/___/___

TSD FACILITY ACTIVITY SUMMARY[illegible]

RECEIVED

FEB 01 1994

TEEA-DLPC

OWNER**OPERATOR**

Name	Glen Wellman	Name	IWI Industries
Address	7738 W 61 st Place	Address	~ same ~
City	Summit	City	
State	IL	State	
Zip	60501	Zip	
Phone #	708-458-8700	Phone #	

PERSON(S) INTERVIEWED**TITLE****PHONE #**

Dan Ehrler	Production Foreman	708-458-8700

INSPECTION PARTICIPANT(S)**AGENCY/TITLE****PHONE #**

Tina Kovaszay	IEPA - EPS	708-531-5900
Mike Cimaglio	"	"

PREPARED BY**AGENCY/TITLE****PHONE #**

Tina Kovaszay	"	"
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SUMMARY OF APPARENT VIOLATIONS

Area	Class	Section
		New-Cited 11-94
		808.121(a)
		Outstanding-Cited 11-94
GGR	1	722.111
May be applicable based on the waste determination		
GGR	1	722.112(a)
GPT		722.134(a)
DMC		(725.271)
DMC		(725.273(a))
DMC		(725.273(b))
DMC		(725.274)
DTR		(725.291(a))
DTR		(725.193(a))
DTR		(725.294)

Area	Class	Section
DTR		(725.295(a))
DTR		(725.295(c))
DTR		(725.296)
DTR		(725.296(d))
DPP		(725.131)
DPP		(725.132)
DPP		(725.134)
DPP		(725.135)
DPP		(725.137)
DCP		(725.151(a))
DCP		(725.155)
DCP		(725.156(a-h))
DGS		(725.116(a))

Area	Class	Section
DGS		(725.116(d))
DOR		703.150(a)
DGS		725.111
DGS		725.113(a)
DGS		725.113(b)
DGS		725.114(c)
DGS		725.115(a)
DGS		725.115(b)
DGS		725.115(c)
DGS		725.115(d)
DGS		725.116(a)
DGS		725.116(d)
DPP		725.131

Summary of Violations - Continued

Area	Class	Section
PP		725.132
PP		725.134
PP		725.135
PP		725.137
DCP		725.151(a)
DCP		725.155
DCP		725.156(a-h)
DMR		725.173
DMR		725.174(a)
DMR		725.175
DMR		725.176

Area	Class	Section
DMR		725.177
DCI		725.212(a)
DFR		725.242(a)
DMC		725.271
DMC		725.273(a)
DMC		725.273(b)
DMC		725.274
DTR		725.291(a)
DTR		725.293(a)
DTR		725.294
DTR		725.295(a)

Area	Class	Section
DTR		725.295(c)
DTR		725.296
DTR		725.296(d)
GLB		728.107(a)
GLB		728.150(a)(1)
DLB		728.150(a)(2)
DLB		728.150(c)

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FEB 01 1994
IEPA-DLPC

NARRATIVE

RECEIVED
FEB 01 1994
IEPA-DLPC

IWI Industries manufactures and repairs portable tote tanks. According to Dan Ehrler, Production Foreman, approximately 1,000 totes are manufactured per year, and approximately 1,000 are repaired. IWI no longer cleans out used tanks. The totes are cleaned out before arriving at IWI. According to Mr. Ehrler there is no hazardous waste generated, stored, or disposed of on-site. During the inspection, it was discovered that IWI is storing a very large amount of material on-site. Mr. Ehrler claims that the material on-site is not hazardous waste and can be used in the future. According to Mr. Ehrler, IWI is currently sorting through the drums on-site to determine if the material is usable. There is a substantial decrease in the amount of drums found on-site since the last inspection. Waste paint is being reused as primer on totes. Some drums were found to be empty, and the material found to be unusable is still being stored on-site. Mr. Ehrler stated that all activities are being documented, and an inventory of usable material, empty drums, and non-usable material is being kept by Mr. Wellman. This inventory was not available at the time of the inspection. Per a phone conversation with Mr. Wellman on January 12, 1994, no such log is kept. The following is an inventory of material found on-site. Because of the condition of the site, this inventory is not exact.

Building P

- 1) 107 drums labeled "grease"
- 2) empty totes
- 3) area along north wall saturated with what appears to be grease and/or oil (photo 1)

Building G

Burned out building used to store what appears to be paint waste. This material is approximately 2-3 feet deep and is stored on the floor of the building. This building has holes in the south wall, which are allowing the material to migrate into building P. According to Mr. Ehrler, the material has been in the building at least as long as he has been employed by IWI which is 15 years.

Building H

4 drums of grease are located in this building.

Building F

Burned out building used to store what appears to be paint waste. This material is approximately 2-3 feet deep and is stored on the floor of the building (photos 4 and 5). This building has an opening on the west wall which appears to have been used to dump the waste into the building (photos 2 and 3). According to Mr. Ehrler, the material has been in the building at least as long as he has been employed by IWI which is 15 years.

Building L

No evidence of waste in this building.

Building D

No evidence of waste in this building.

Building S

Numerous totes filled with "grease". Location of former process area where totes were emptied and cleaned out. Tank is currently filled with what appears to be paint waste (photo 6). This building also contains 2-30 gallon fiber drums which have completely collapsed and are open (photo 7). One of the drums was labeled "corrosive solid NOS - corrosive material UN1759" (photo 8). Both drums contain a white solid.

Building A

Approximately 50 totes - contents unknown. Approximately 200 drums containing various materials (photos 9, 10, and 11). Sump located along north wall with a pipe leading to it - filled with unknown liquid material. The majority of the drums in this area are in very poor condition, and left open. It appears as if waste has been removed from this building. According to Mr. Ehrler, waste paint is being reused as primer on totes, and some drums were found to be empty. An inventory of drums which have been removed is not being kept.

Building O

No evidence of waste in this building.

Building N

3 drums and 5-5 gallon pails of grease (photo 15), one drum and one partially filled tote containing paint (photos 12 and 13), and one vat with a drum draining into it containing an unknown material (may be grease - photos 12 and 14).

Building M

Area where production occurs. Storage of finished totes Old Nozzle Test Cabinet. Pipe leading from building to east ditch. Dumpster in building contained paint residue (photos 16 and 17).

Hazardous Waste Units

The following areas will be storage areas if the material on-site is found to be hazardous.

S01 - Container Storage Areas

Building P: southwest corner - 107 drums

Building H: center of building - 4 drums

Building S: against west wall - totes fill with "grease", and southwest corner of building containing collapsed drums labeled corrosive.

Building A: entire building - >50 totes, >200 drums

Building O: southwest corner - >15 totes along south wall and previously had 54 drums along north wall

Building N: south section of building which previously contained paint waste and drums labeled hydrofluoric acid--currently contains 3 drums, 5 pails and 1 vat of what may be grease and 1 drum and 1 partially filled tote of paint

Outside Building G/F: west side of building - previous location of a container with unknown material

Outside Building S: west side of building - previous location of tote filled with "grease", dumpster filled with an unknown material and general refuse

Outside Building O: northeast corner of courtyard - previous location of 1 drum of paint waste

S02 - Tank Storage

Building G/F: Entire building has been considered a tank. Approximately 2-3 feet of waste covering floor

Outside Building G: Black tank containing unknown material

Building S: Former process area - tank formerly used to clean out totes brought in from off-site

S04 - Surface Impoundment

In the past, the ditch located on the west side of the facility which supposedly contained waste was considered to be a surface impoundment. Supposedly, soil was excavated from this area sometime in the past, but the location of the excavated material is unknown, and closure was never conducted. According to Mr. Wellman, the property directly west of the fuel oil tank is not owned by IWI. A certified appraisal of the property boundary was conducted some time in June, 1992 by Mike Witten (United Appraisal Company - 708-460-5800). It is the opinion of this inspector that IWI does not operate a RCRA surface impoundment.

Additional Notes

Area along north wall of Building P is saturated with grease or oil. A waste determination must also be made on this material.

Paint chips and floor scrapings were observed in the dumpster. This is a special waste and should be disposed of as such (photos 16 and 17).

Apparent Violations

New - Cited 1-11-94:

808.121(a) - IWI has not determined whether the paint chips and paint scrapings found in the dumpster in building M are a special waste.

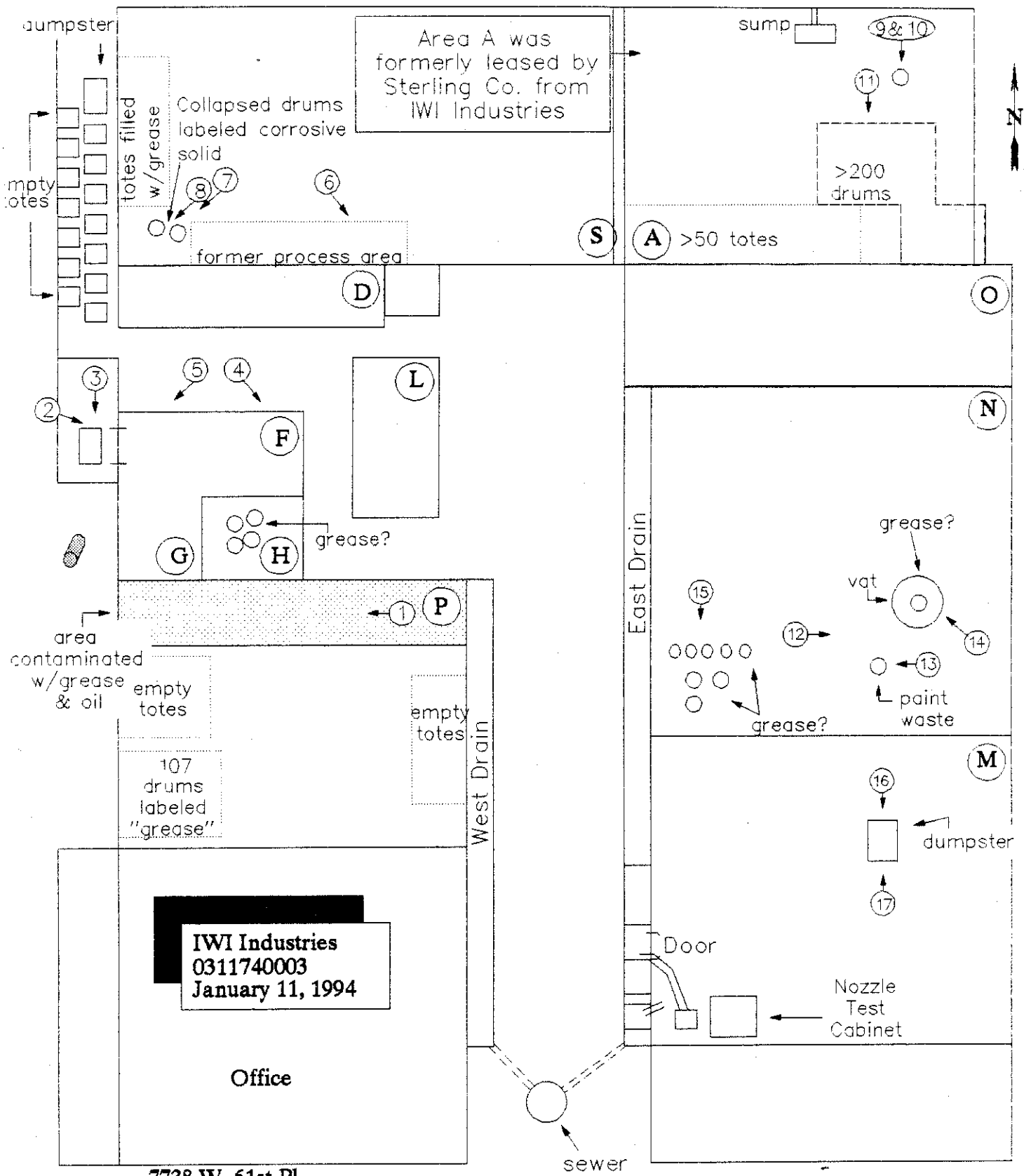
Outstanding - Cited 11-24-92:

722.111 - IWI must make a waste determination on any materials which appear to be waste.

The following violations may be applicable based on the waste determination:

- 722.112(a) - Generator has not obtained a USEPA ID # (no 8700-12 form submitted)
- 722.134(a) - Have not complied with Part 725, Subpart I&J (no dates, labels, etc.)
- (725.271) - Containers are in poor condition and are leaking
- (725.273(a)) - Containers must always be closed during storage
- (725.273(b)) - Containers are stored and handled in a manner which may cause the containers to rupture or leak
- (725.274) - No inspections of containers are being conducted
- (725.291(a)) - No independent, certified, written assessments of tanks is available
- (725.193(a)) - No secondary containment has been provided for the three tanks on-site
- (725.294) - No spill prevention controls on tanks
- (725.295(a)) - No tank inspections are being conducted
- (725.295(c)) - No documentation of inspections in operating record
- (725.296) - Tanks which have had leaks or spills must be removed from service immediately
- (725.296(d)) - Releases were not reported to the Agency
- (725.131) - Facility is not maintained to minimize the possibility of releases of hazardous waste to the environment
- (725.132) - No required equipment: internal, external alarms or communication devises, fire, spill, or decontamination equipment
- (725.134) - No immediate access to alarm or emergency communication devise
- (725.135) - Inadequate aisle space
- (725.137) - No arrangements with local authorities
- (725.151(a)) - No contingency plan
- (725.155) - No emergency coordinator
- (725.156(a-h)) - No action taken upon release of waste
- (725.116(a)) - No personnel training
- (725.116(d)) - No documentation of personnel training
- 703.150(a) - No Part A submitted
- 725.111 - Facility owner must apply for a USEPA ID # (no 8700-12 form submitted)
- 725.113(a) - No waste analysis provided before storage
- 725.113(b) - No written waste analysis plan
- 725.114(c) - No "Danger-Unauthorized Personnel Keep Out" sign posted near storage areas
- 725.115(a) - No inspections being conducted
- 725.115(b) - No written inspection schedule
- 725.115(c) - No remediation of deteriorations
- 725.115(d) - No inspection log or summary
- 725.116(a) - No personnel training
- 725.116(d) - No documentation of personnel training
- 725.131 - Facility is not maintained to minimize the possibility of releases of hazardous waste to the environment

- 725.132 - No required equipment: internal or external alarms or communication devices, fire, spill, or decontamination equipment
- 725.134 - No immediate access to alarm or emergency communication device
- 725.135 - Inadequate aisle space
- 725.137 - No arrangements with local authorities
- 725.151(a) - No contingency plan
- 725.155 - No emergency coordinator
- 725.156(a-h) - No action taken upon release of waste
- 725.173 - No operating record
- 725.174(a) - No records were available at the time of the inspection
- 725.175 - No facility annual reports have been submitted
- 725.176 - Accepted hazardous waste without a manifest (no unmanifested waste report filed)
- 725.177 - No reports regarding releases have been submitted to the Agency
- 725.212(a) - No closure plan
- 725.242(a) - No written closure cost estimate
- 725.271 - Containers are in poor condition and are leaking
- 725.273(a) - Containers must always be closed during storage
- 725.273(b) - Containers are stored and handled in a manner which may cause containers to rupture or leak
- 725.274 - No inspections of containers are being conducted
- 725.291(a) - No independent, certified, written assessment of tanks is available
- 725.293(a) - No secondary containment has been provided for the three tanks on-site
- 725.294 - No spill prevention controls on tanks
- 725.295(a) - No tank inspections are being conducted
- 725.295(c) - No documentation of inspections in operating record
- 725.296 - Tanks which have had leaks or spills must be removed from service immediately
- 725.296(d) - Releases were not reported to the Agency
- 728.107(a) - Generator has not tested his waste to determine if it is restricted from land disposal
- 728.150(a)(1) - Storage of LDR waste not necessary to facilitate proper disposal
- 728.150(a)(2) - Storage containers and tanks are not marked with contents and accumulation dates
- 728.150(c) - Storing LDR waste for greater than a year--not necessary for proper disposal



7738 W. 61st Pl.

61st Place

Not to scale

Illinois Environmental Protection Agency Photographs

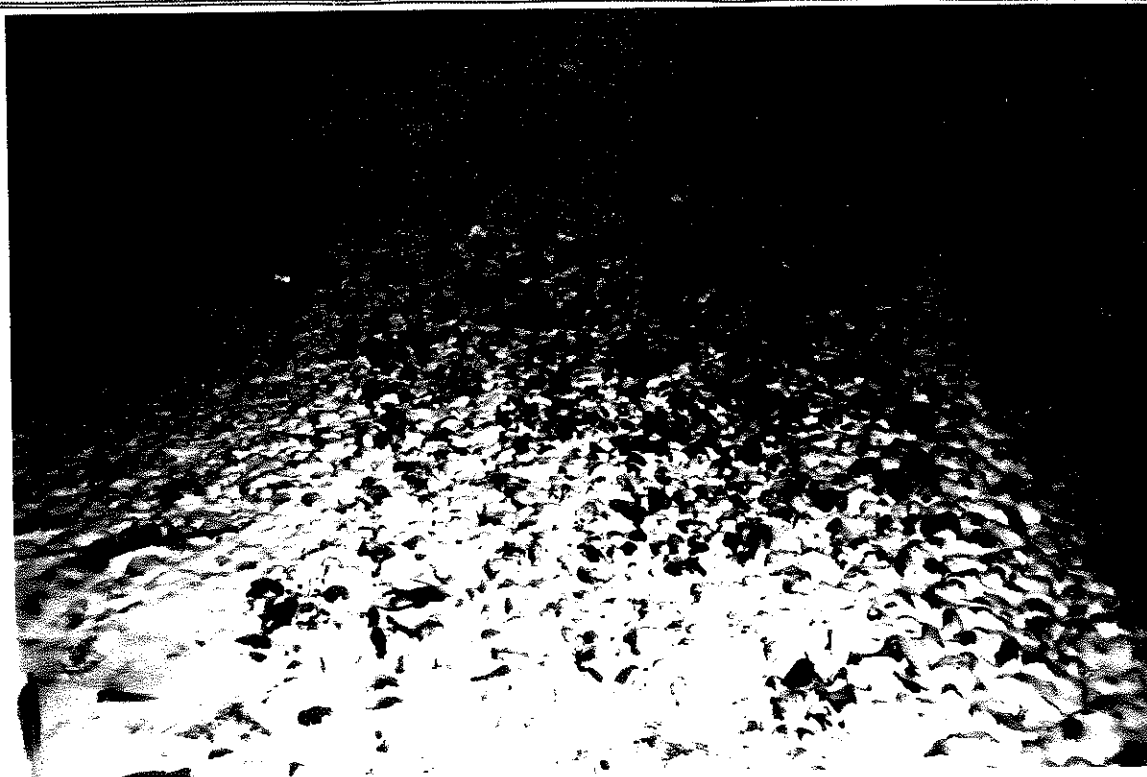
Site Name: IWI Industries

IEPA #: 0311740003

Date: January 11, 1994

Time: 9:00 - 9:50

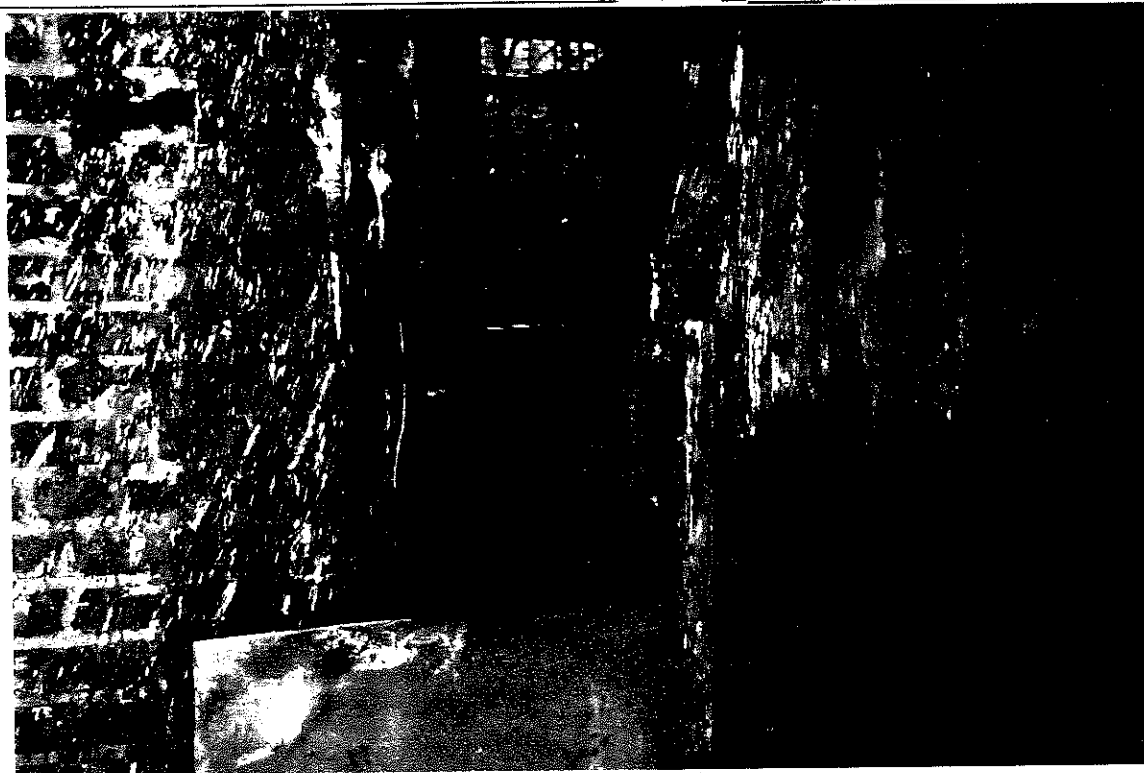
Photograph By: Tina Kovasznay



Comments: W - Along north wall of Building P--appears to be contaminated with oil or grease.

Roll #: 94-218

Photo #: 1



Comments: SE - Looking into Building F - unknown waste material hanging off edge of tank like structure.

Roll #: 94-218

Photo #: 2

Illinois Environmental Protection Agency
Photographs

IEPA #: 0311740003
IEPA Industries

January 11, 1994

Time: 9:00 - 9:50

Photograph By: Tina Kovaszny



Unknown material in container on west side of Building G/F. Drum draining into top level. In same condition as on 11-24-93

Roll #: 94-218

Photo #: 3

Illinois Environmental Protection Agency Photographs

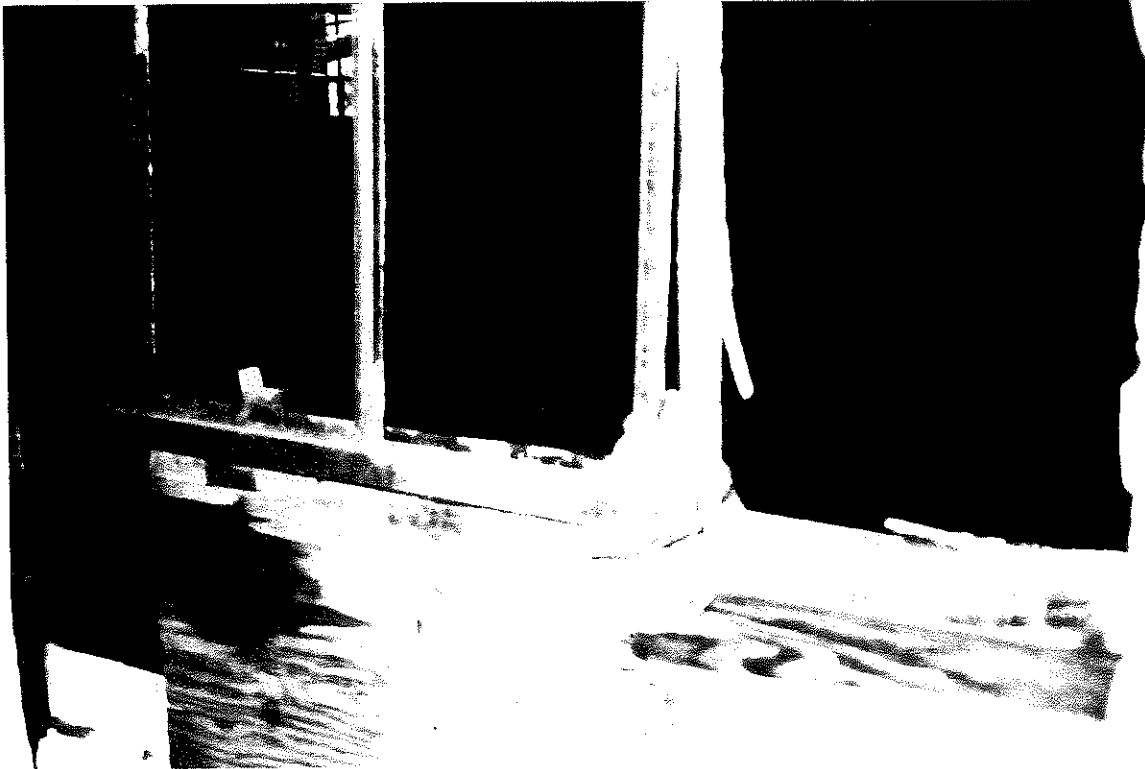
Site Name: IWI Industries

IEPA #: 0311740003

Date: January 11, 1994

Time: 9:00 - 9:50

Photograph By: Tina Kovaszny



Comments: SE - Inside Building F--approximately 2 feet of unknown material on floor.

Roll #: 94-218

Photo #: 4



Comments: SW - Foreground, Building F. Background, Building G. Approximately 2 feet of unknown material on floor.

Roll #: 94-218

Photo #: 5

Illinois Environmental Protection Agency
Photographs

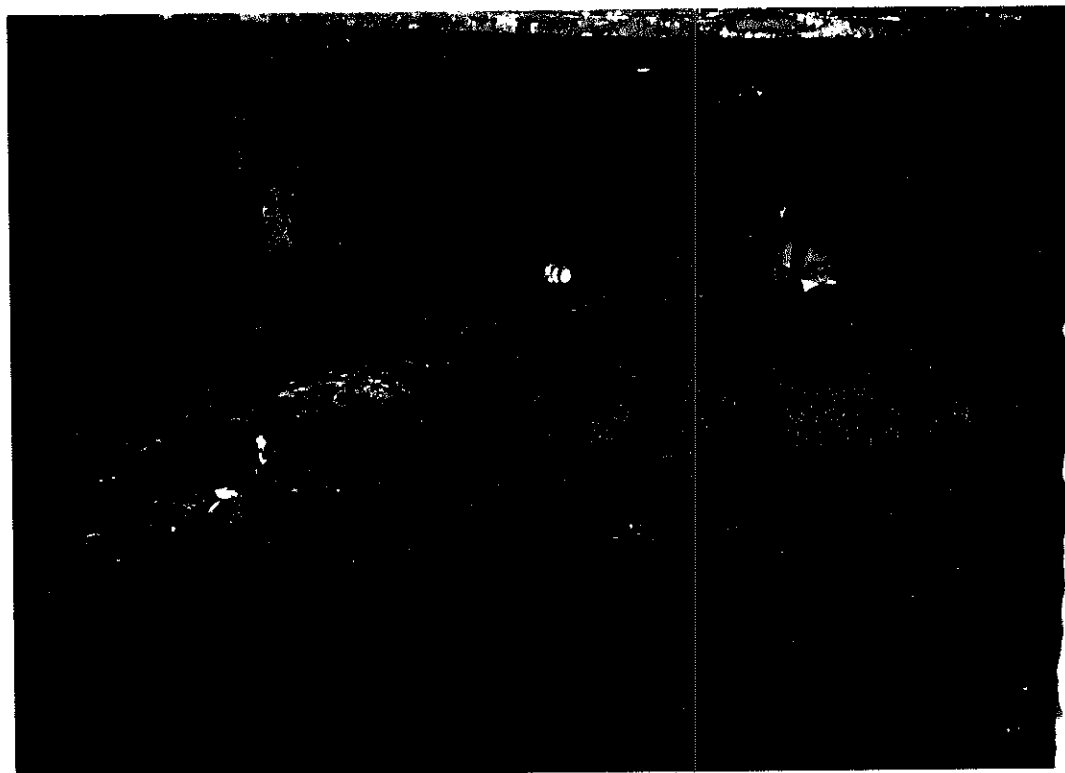
Site Name: IWI Industries

IEPA #: 0311740003

Date: January 11, 1994

Time: 9:00 - 9:50

Photograph By: Tina Kovaszny



Comments: SE - Material found in former processing tank. Building S.

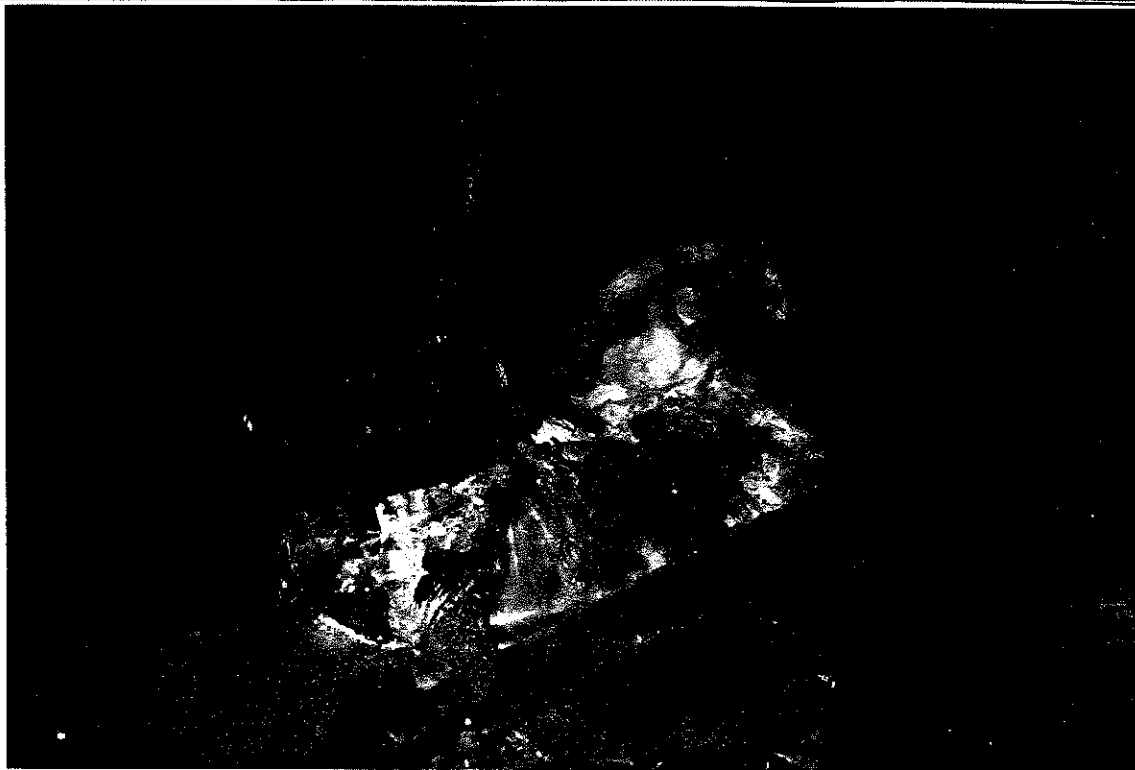
Roll #: 94-218

Photo #: 6

Illinois Environmental Protection Agency Photographs

Site Name: IWI Industries IEPA #: 0311740003

Date: January 11, 1994 Time: 9:00 - 9:50 Photograph By: Tina Kovasznay



Comments: SW - Building S--two deteriorated drums labeled corrosive. two such drums were found during the 11-24-92
insp. in good condition (photo 45)--said to be usable material. Roll #: 94-218 Photo #: 7



Comments: SW - Close-up of photo #7--labeled corrosive solids, NOS Corrosive Material UN1759. Appears to contain a
white solid. Roll #: 94-218 Photo #: 8

Illinois Environmental Protection Agency Photographs

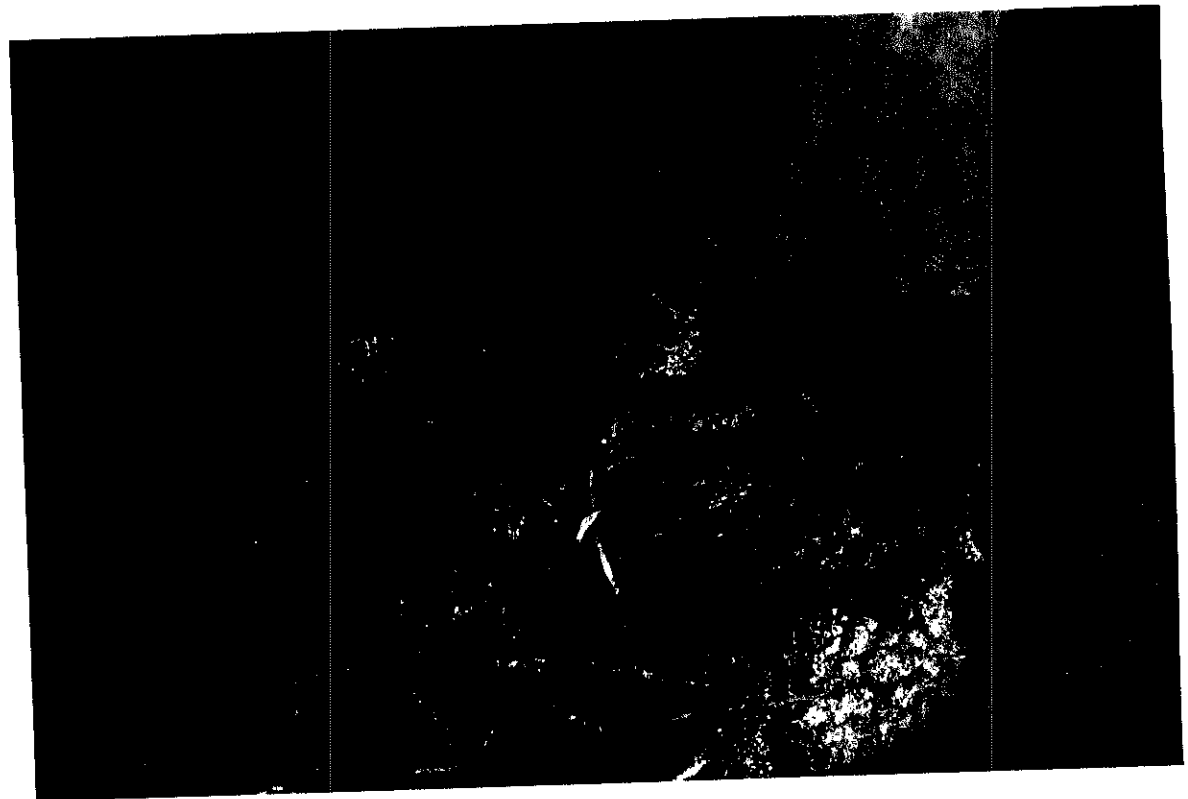
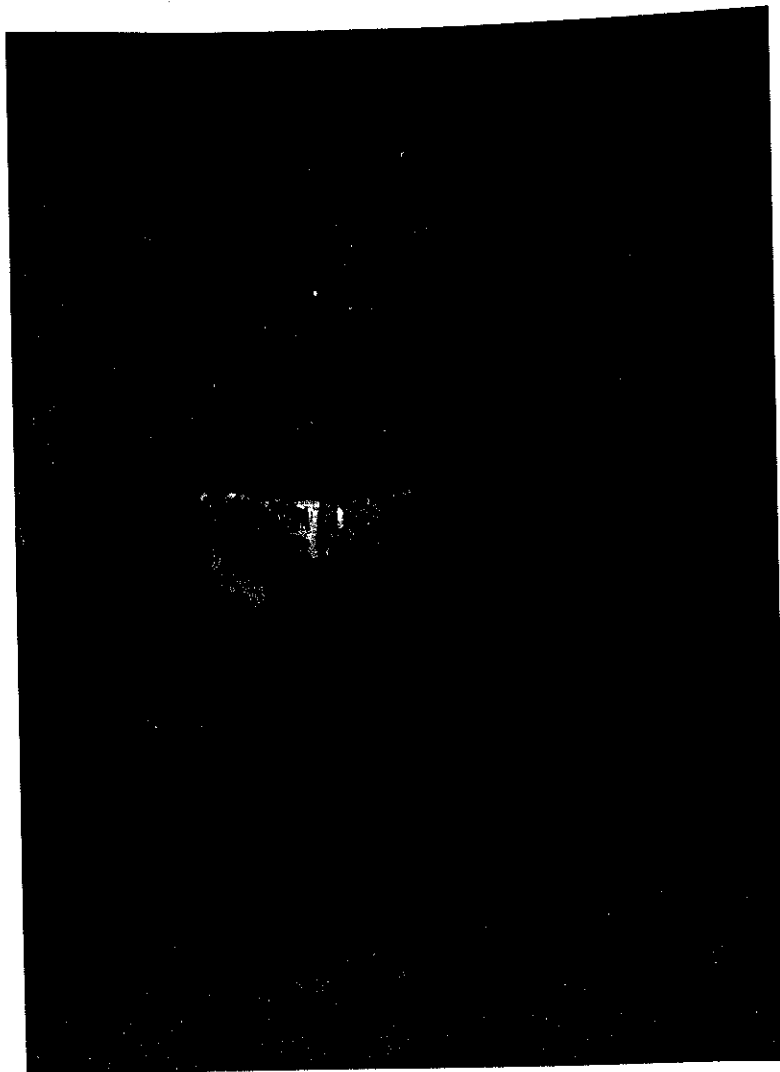
Site Name: IWI Industries

IEPA #: 0311740003

Date: January 11, 1994

Time: 9:00 - 9:50

Photograph By: Tina Kovasznay



Comments: S - Drum filled w/unknown material (rusting), and close up of contents with dead animal inside. Building A.

Roll #: 94-218

Photo #: 9 & 10

Illinois Environmental Protection Agency Photographs

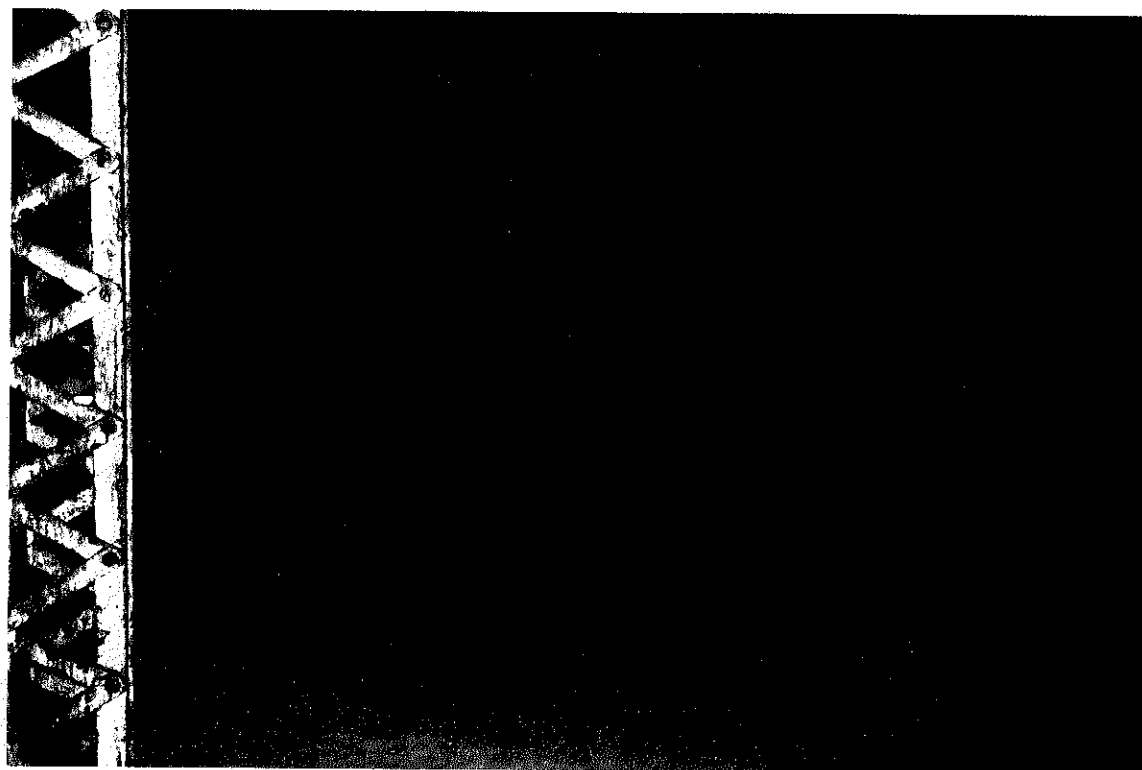
Site Name: IWI Industries

IEPA #: 0311740003

Date: January 11, 1994

Time: 9:00 - 9:50

Photograph By: Tina Kovaszny



Comments: S - Building A--Drums and totes in poor condition filled with unknown material.

Roll #: 94-219

Photo #: 11

Illinois Environmental Protection Agency Photographs

Site Name: IWI Industries

IEPA #: 0311740003

Date: January 11, 1994

Time: 9:00 - 9:50

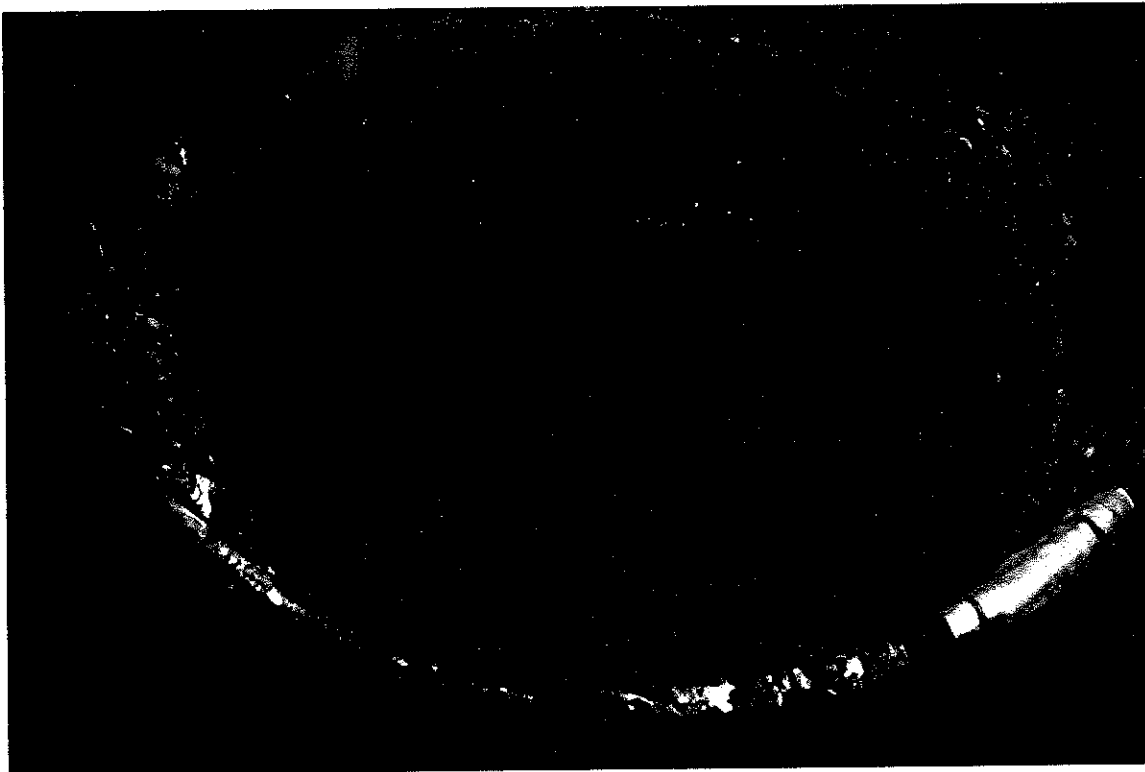
Photograph By: Tina Kovasznay



Comments: E - Building N--Vat w/drum draining into it, and drum filled with what appears to be usable paint in it

Roll #: 94-219

Photo #: 12



Comments: W - Close-up of drum in photo #12.

Roll #: 94-219

Photo #: 13

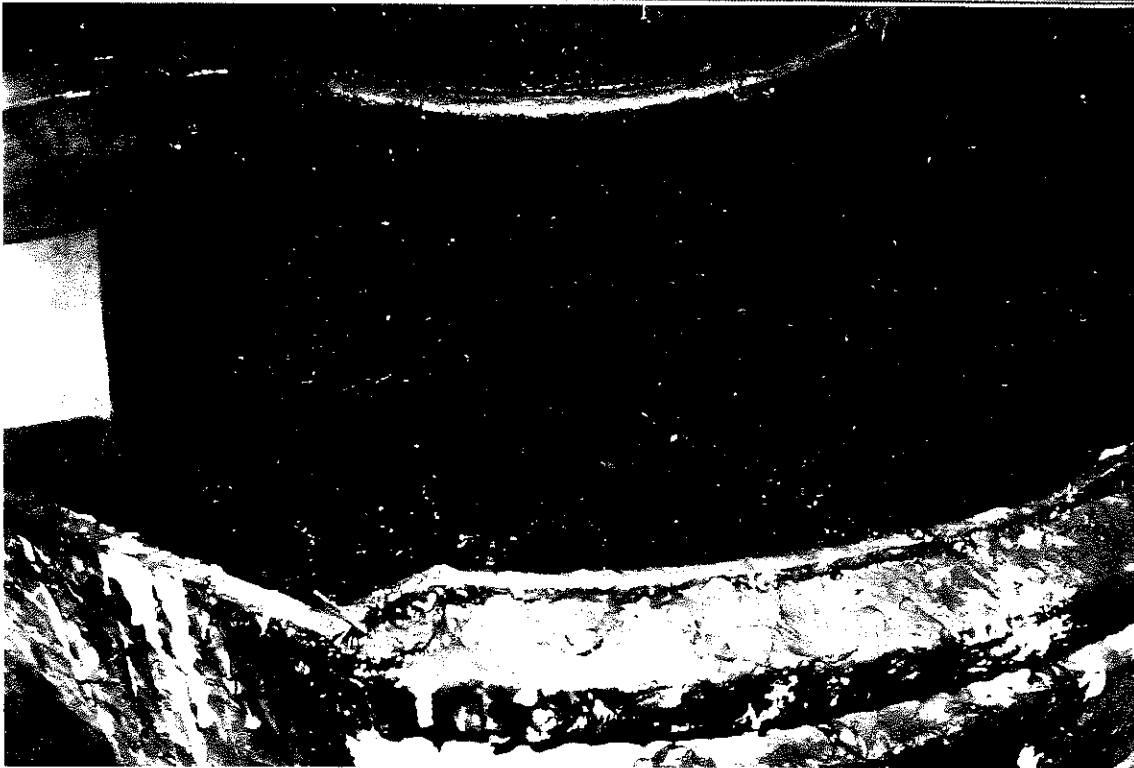
Illinois Environmental Protection Agency Photographs

Site Name: IWI Industries

IEPA #: 0311740003

Date: January 11, 1994 Time: 9:00 - 9:50

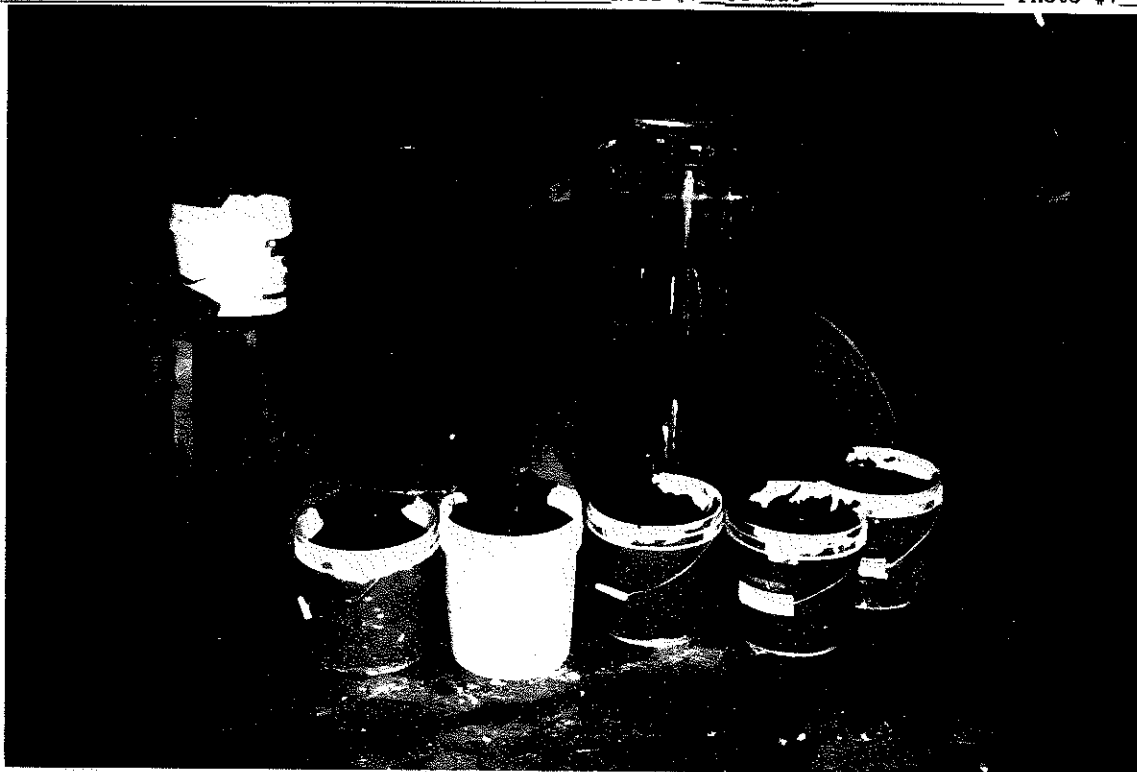
Photograph By: Tina Kovasznay



Comments: NW - Close-up of vat in photo #12.

Roll #: 94-219

Photo #: 14



Comments: S - 3 drums and 5-5 gallon pails of what may be grease.

Roll #: 94-219

Photo #: 15

Illinois Environmental Protection Agency Photographs

Site Name: IWI Industries

IEPA #: 0311740003

Date: January 11, 1994

Time: 9:00 - 9:50

Photograph By: Tina Kovaszny



Comments: S - Building M--Dumpster filled with dried paint chips, and close up of dumpster contents.

Roll #: 94-219

Photo #: 16 17

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: 1W1 Industries
 U.S. EPA ID No.: ILD097179204/0311740003
 Street: 7738 west 61st Place
 City: Summit State: IL Zip: 60501
 Telephone: 708-458-8700

Inspection Date: 1/11/94 Time: 9-9⁵⁰ (am/pm)

Weather Conditions: _____

	Name	Agency/Title	Telephone
Inspectors:	<u>Tina Kovaszny</u>	<u>IEPA-EPS</u>	<u>708-531-5900</u>
	<u>Mike Cimaglio</u>	<u>"</u>	<u>"</u>
Facility Representatives:	<u>Dan Ehrler</u>	<u>Production Foreman</u>	<u>708-458-8700</u>

See Appendix B to determine which of the following LDR waste categories the facility manages:

	Generate	Transport	Treat	Store	Dispose
F001-F005 Solvents	_____	_____	_____	_____	_____
F020-F023 and F026-F028	_____	_____	_____	_____	_____
California List*	_____	_____	_____	_____	_____
First Third [40 CFR 268.10]	_____	_____	_____	_____	_____
Second Third [40 CFR 268.11]	_____	_____	_____	_____	_____
Third Third [40 CFR 268.12]	_____	_____	_____	_____	_____

UNDETERMINED

* See Appendix A

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

See narrative

LDR Waste Management:

Summary:

Signature:

Lina Kovasynay

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes ___ No ___ NA ___

C. Management

1. On-Site Management

- a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes ☒ No ___

(If yes, the TSD Checklist must also be completed.)

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments _____

- b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ___ No ___ NA ___

- c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ___ No ___ NA ___

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off-Site Management: Waste Exceeds Treatment Standards

- a. Does the generator ship any waste that exceeds treatment standards /prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes ___ No ___ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code

Receiving Facility

N/A

Does the generator provide a notification to the treatment or storage facility?
[40 CFR 268.7(a)(1)]

Yes ___ No ___ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ___

b. Is a notification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ___ No ___ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ___ No ___ (If No, go to d.)

Does the documentation discussed in points 2. and 3. reflect proper historical management of wastes previously covered under expired national capacity variances, case by case extensions, and the soft hammer provision?*

Yes ☐ No ☐ NA ☐

*Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third Rule were granted a minimum 90-day national capacity variance to 08/08/90.

C. Storage [40 CFR 268.50]

1. Are prohibited* wastes stored on site in containers?

Yes ☒ No ☐ (If No, go to 2.)

*See Appendix E for distinction between restricted and prohibited wastes.

Are all containers clearly marked to identify the contents and date(s) entering storage? [40 CFR 268.50(a)(2)(i)]

Yes ☐ No ☒

Have wastes been stored for more than one year since the applicable LDR regulations went into effect?

Yes ☒ No ☐ (If No, go to 2.)

Can the facility show that such accumulation is necessary to facilitate property recovery, treatment, or disposal? [40 CFR 268.50 (c)]

Yes ☐ No ☒

If yes, state how: _____

2. Are prohibited wastes stored on site in tanks?

Yes ☒ No ☐ (If No, go to 3.)

Are all tanks clearly marked with a description of the contents, the quantity of each hazardous waste received, and date each period of accumulation begins, or is such information recorded and maintained in the operating record? [40 CFR 268.50(a)(2)(ii)]

Yes ☐ No ☒

Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ☐ No ☒ (If Yes, go to 3.)

Can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal? [40 CFR 268.50(c)]

Yes ☐ No ☒

If yes, state how: _____

3. Does the facility store liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm?

Yes ☐ No ☒ (If No, go to D.)

Does the facility meet the TSCA criteria in 40 CFR 761.65(b)? [40 CFR 268.50(f)]

Yes ☐ No ☐

Have these wastes been stored for more than one year? [40 CFR 268.50(f)]

Yes ☐ No ☐

D. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes ☐ No ☐ (If No, do not complete this section. Go to E.)

2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)]

Yes ☐ No ☐ NA ☐ (If Yes or NA, go to 3.)

Was an alternative method approved?

Yes ☐ No ☐

List each waste code, the technology specified in 40 CFR 268.42, and the alternative method. Check if approval of the alternative method is documented. [40 CFR 268.42(b)]

<u>Waste Code</u>	<u>Required Technology</u>	<u>Alternative Method</u>	<u>Approval</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

3. Lab packs: If alternative treatment standards are specified, are incinerator residues from lab packs containing D004, D005, D006, D007, D008, D010, and D011 treated in compliance with the subpart D treatment standards for these characteristic wastes? [40 CFR 268.42(c)(4)]


Yes ☐ No ☐ NA ☐

IWI INDUSTRIES
0811740003
1-11-9

REVISION 1 (8, /88)

Area	Class	90 Day F U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1				PART 722 GENERATOR STANDARDS Subpart A: General Section 722.111: Hazardous Waste Determination Has the generator determined if the solid waste it gener- ates is a hazardous waste? Yes ____ No <input checked="" type="checkbox"/> Did the generator follow the procedures specified in this section in making its determination? Yes ____ No <input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		generate paint waste
OTH	1				Section 722.112: USEPA Identification Number a Has the generator obtained a USEPA identification number? Yes ____ No <input checked="" type="checkbox"/> c Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facili- ties that have received a USEPA identification number? Yes ____ No ____ N/A <input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		No 8700-12 form was ever submitted. IWI was assigned an ID # by the USEPA. The USEPA transfer not original facility needed a number for filling purposes.

GEN-A-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	2			PART 722 GENERATOR STANDARDS Subpart B: The Manifest				<i>No waste shipped off site</i> 
				Section 722.120: General Requirements				
			a	Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes ____ No ____ <i>N/A ✓</i>				
				Note: If the generator has not used a manifest, check "No" in the Apparent Compliance Column and skip to 722.130.				
			b	Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes ____ No ____				
				Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility.				
			d	In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes ____ No ____				

GEN-B-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
					<p>3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes ____ No ____</p> <p>4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes ____ No ____</p> <p>NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s.</p> <p>b Has the generator apparently given the remaining copies of the manifest to the transporter? Yes ____ No ____</p> <p>c Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes ____ No ____ N/A ____</p> <p>d Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes ____ No ____ N/A ____</p>				

GEN-B-?

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
					PART 722 GENERATOR STANDARDS Subpart C: Pre-Transport Requirements				
OTH	1	X			Section 722.130: Packaging Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?			✓	No waste ready for transport off-site
OTH	1	X			Section 722.131: Labeling Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?			✓	
OTH	1	X			Section 722.132: Marking a Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes ____ No ____ b Is each package of hazardous waste which is ready for transportation off-site marked with: - The generator's name and address? Yes ____ No ____ - The manifest document number associated with the container? Yes ____ No ____ - The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes ____ No ____			✓	

GEN-C-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1				Section 722.133: Placarding Does the generator have, for the waste it generates, the proper placards to: <ul style="list-style-type: none"> - Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? NOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain.			✓	
OTH	1	X			Section 722.134: Accumulation Time NOTE: If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist. NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area. a For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below: NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.		✓		

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1	X			Section 722.134: Accumulation Time		<input checked="" type="checkbox"/>		
					NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.				
			a1		For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I?				
					and/or				
					For waste in tanks, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J except Section 725.297(c) and 725.300? Yes _____ No <input checked="" type="checkbox"/>				
			a2		For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes _____ No <input checked="" type="checkbox"/> N/A _____				
			a3		For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes _____ No <input checked="" type="checkbox"/>				
			a4		Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subparts C and D, and Section 725.116? Yes _____ No <input checked="" type="checkbox"/>				

GEN-C-2(a)

Area	Class	90 Day F U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr	Sub Sec		Yes	No		
					<p>Condition of Containers (Section 725.271)</p> <p>Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>Compatibility of Waste with Container (Section 725.272)</p> <p>Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired? Yes <input checked="" type="checkbox"/> No _____</p> <p>Management of Containers (Section 725.273)</p> <p>Are containers of hazardous waste always closed during storage? Yes _____ No <input checked="" type="checkbox"/></p> <p>Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes _____ No <input checked="" type="checkbox"/></p> <p>Inspections (Section 725.274)</p> <p>Is the owner or operator inspecting areas where the containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes _____ No <input checked="" type="checkbox"/></p> <p>NOTE: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done.</p>				

Area	Class	90 Day F U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr	Sub Sec		Yes	No		
					<p>Special Requirements for Ignitable or Reactive Wastes (Section 725.276)</p> <p>Are containers holding ignitable or reactive waste located at least 50 feet from the property line? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Special Requirements for Incompatible Wastes (Section 725.277)</p> <p>Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

GEN-C-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>FOR WASTE IN TANKS, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J: Tank Systems listed below:</p> <p>NOTE: If the facility has discontinued accumulation of waste in tanks, they are subject to 725.211 and 725.214.</p> <p>NOTE: If no waste in tanks, mark N/A and skip to "For waste in containers ...", Subsection a)2) page GEN-C-14.</p> <p>Assessment of Existing Tank Systems (Section 725.291)</p> <p>For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes ____ No <input checked="" type="checkbox"/></p> <p>NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.</p> <p>Does this assessment consider at least the following:</p> <ol style="list-style-type: none"> 1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection, or other tank integrity examination? <p>Yes ____ No ____</p>				No assessments

GEN-C-5

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Design and Installation of New Tank Systems or Components (Section 725.292)</p> <p>Is secondary containment provided for any new tank system (constructed after July 14, 1986) before being put into service? Yes _____ No _____ N/A <u>✓</u></p> <p>For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared? Yes _____ No _____</p> <p>Does the assessment include, at a minimum, the following:</p> <ol style="list-style-type: none"> 1) design standard for tanks and ancillary equipment; <p>NOTE: These standards should include protection from damage from vehicular traffic, adequate foundations, anchoring to prevent flotation or dislodgement, and withstanding the effects of frost heave.</p> <ol style="list-style-type: none"> 2) hazardous characteristics of the waste; and 3) evaluation of potential for corrosion and corrosion protection measures? Yes _____ No _____ <p>Has the owner obtained and kept on file at the facility the certifications of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____</p> <p>Containment and Detection of Releases (Section 725.293)</p> <p>Does an existing tank, which stores F020, F021, F022, F023, F026 or F027 waste(s) have secondary containment (secondary containment is required by January 12, 1989)? Yes _____ No _____ N/A <u>✓</u></p>				<p>no new tanks</p> <p>no rock wastes</p>

GEN-C-6

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
					<p>For an existing tank, of known age, which stores any hazardous waste, is secondary containment provided (secondary containment is required by January 12, 1989 or when the tank is 15 years old, whichever is later)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>For an existing tank of unknown age, has secondary containment been provided by January 12, 1995? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p><u>or</u></p> <p>If the facility is older than 7 years, by the time the facility reaches 15 years of age or January 12, 1989, whichever is later? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>For tanks that store wastes that are listed as hazardous after 1/12/87, has secondary containment been provided on the same basis as required in Subsections (a)(1) through (a)(4) of 725.293 substituting the date that a material becomes a hazardous waste for 1/12/87? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Is the secondary containment system designed, installed and operated to prevent migration of wastes out of the system, and capable of detecting and collecting releases? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>NOTE: To meet the requirements of Subsection (b) secondary containment must comply with the physical requirements given in Subsection (c)(1) through (4) (compatible liner, foundation, leak detection system).</p> <p>Are spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				No secondary containment

GEN-C-7

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>NOTE: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p> <p>Does the secondary containment have one or more of the following:</p> <ol style="list-style-type: none"> 1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>NOTE: Liners, vaults or double-walled tanks must also comply with the requirements of Section 725.293, Subsection (e) or "No" should be marked and explained in the comment.</p> <p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for:</p> <ol style="list-style-type: none"> 1) above ground piping (exclusive of flanges, joints, valves and connections) that are inspected daily; 2) welded flanges, joints and connections that are inspected daily; 3) sealless or magnetic coupling pumps that are inspected daily; and 4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p>				

GEN-C-8

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (1)(1) and (2)? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>General Operating Requirements (Section 725.294)</p> <p>Are tanks equipped with spill prevention controls (e.g., check valves, dry disconnect couplings) and overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank)? Yes ____ No <input checked="" type="checkbox"/></p> <p>Is a sufficient freeboard being maintained in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>If a leak or spill has occurred in the tank system, has the owner or operator complied with the requirements of 725.296? Yes ____ No <input checked="" type="checkbox"/> N/A ____</p>				<p>no USTs</p> <p>↓</p> <p>no assessments</p>

GEN-C-9

Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Inspections (Section 725.295)</p> <p>Is the facility operator inspecting and documenting, in an operating record, the results of tank inspection as required in 725.295, Subsections (a) and (b)? Yes _____ No <input checked="" type="checkbox"/></p> <p>Response to Leaks or Spills and Disposition of Tank Systems (Section 725.296)</p> <p>Does the facility have a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: If "No", skip to Closure and Post Closure Care (Section 725.297). If "Yes", answer the following questions.</p> <p>If a tank or secondary containment system has leaked, has the owner done the following:</p> <ol style="list-style-type: none"> 1) Ceased using, stopped inflow of wastes? Yes <input checked="" type="checkbox"/> No _____ 2) Removed the waste from the tank system within 24 hours and/or from the secondary containment system within 24 hours? Yes _____ No <input checked="" type="checkbox"/> 3) Taken actions to prevent waste migration and removed and properly disposed of visibly contaminated soil or subsurface water? Yes _____ No <input checked="" type="checkbox"/> 				

GEN-C-10

Area	Class	90 Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr	Sub Sec		Yes	No		
					<p>4) Reported to the Agency within 24 hours of detection? Yes ____ No <input checked="" type="checkbox"/></p> <p>NOTE: Reporting to the Agency is not necessary if less than one pound of material which was <u>immediately</u> contained and cleaned up was spilled.</p> <p>5) Within 30 days of detection of a release, submitted a report to the Agency that complies with Section 725.296(d)(3)(A) through (E)? Yes ____ No <input checked="" type="checkbox"/></p> <p>If the source of the release was from a component of a tank system without secondary containment, has the owner provided secondary containment (that satisfies 725.293) to the component of the system before it is returned to service? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>NOTE: If the component is above ground and can be visually inspected then secondary containment is not needed.</p> <p>Certification of major repairs. If an extensive repair has been done, then is a certification by an independent, registered professional engineer, that the repaired system is capable of handling hazardous waste available before the tank is returned to service? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>Has the certification been submitted within 7 days after returning the tank system to use? Yes ____ No ____ N/A ____</p>				no repairs

GEN-C-11

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
					<p>Closure and Post Closure Care (Section 725.297)</p> <p>NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Special Requirements for Ignitable or Reactive Wastes (Section 725.298).</p> <p>At the time of closure, has the owner removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste (unless 721.103(d) applies)? Yes _____ No _____</p> <p>Has the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes _____ No _____</p> <p>If contaminated soils are <u>not</u> removed, then has the tank system performed closure and post closure care in accordance with requirements applicable to landfills (Section 725.410)? Yes _____ No _____</p> <p>NOTE: Such a tank system is considered a "Landfill" and shall meet all of the requirements of landfills specified in Subparts G and H.</p> <p>Special Requirements for Ignitable or Reactive Wastes (Section 725.298)</p> <p>Are ignitable or reactive wastes stored in tanks? Yes _____ No _____</p> <p>NOTE: If "No", skip to Special Requirements for Incompatible Wastes (Section 725.299).</p>				<p>no closure being performed</p> <p>Undetermined</p>

GEN-C-12

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>If ignitable or reactive wastes are stored or treated in tanks, then is it in such a way that the waste is protected from material or conditions that may cause it to ignite or react? Yes _____ No _____</p> <p>NOTE: Tank systems used <u>solely</u> for emergencies may store ignitable/reactive wastes.</p> <p>Are there proper protective distances between the waste management area and the facility boundary line? Yes _____ No _____</p> <p>Special Requirements for Incompatible Wastes (Section 725.299)</p> <p>Is Section 725.117 being complied with whenever incompatible wastes are stored in the same tank system or in a tank system which has not been decontaminated? Yes _____ No _____ N/A _____</p>				

GEN-C-13

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			a2	<p>For waste in containers, has the generator marked and made visisble for inspection on each container, the date upon which accumulation began?</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p>				
			a3	<p>For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"?</p> <p>Yes _____ No <input checked="" type="checkbox"/></p>				
			a4	<p>Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart C: Preparedness and Prevention listed below:</p> <p>Maintenance and Operation of Facility (Section 725.131)</p> <p>Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to:</p> <ul style="list-style-type: none"> - Air; - Soil; or - Surface Water, <p>which would threaten human health or the environment?</p> <p>Yes _____ No <input checked="" type="checkbox"/></p>				

GEN-C-14

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Required Equipment (Section 725.132)</p> <p>Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment:</p> <ul style="list-style-type: none"> - An internal communications or alarm system capable of providing immediate emergency instructions? Yes _____ No <input checked="" type="checkbox"/> N/A _____ - A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes _____ No <input checked="" type="checkbox"/> N/A _____ - Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes _____ No <input checked="" type="checkbox"/> N/A _____ - Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems? Yes _____ No <input checked="" type="checkbox"/> N/A _____ <p>NOTE: Any "N/A" answers must be explained in the Remarks column.</p>				

GEN-C-15

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
					<p>Testing and Maintenance of Equipment (Section 725.133)</p> <p>Where required, is the facility testing and maintaining, as necessary, to assure proper operation in time of emergency:</p> <ul style="list-style-type: none"> - Communications/alarm systems? Yes _____ No _____ N/A <input checked="" type="checkbox"/> - Fire protection equipment? Yes _____ No _____ N/A <input checked="" type="checkbox"/> - Spill control equipment? Yes _____ No _____ N/A <input checked="" type="checkbox"/> - Decontamination equipment? Yes _____ No _____ N/A <input checked="" type="checkbox"/> <p>NOTE: Any "N/A" answer must be explained in the Comments.</p> <p>Access to Communications or Alarm Systems (Section 725.134)</p> <p>Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 735.132? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>				no such equipment

GEN-C-16

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Required Aisle Space (Section 725.135)</p> <p>Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>NOTE: Document non-compliance with photograph.</p> <p>Arrangements with Local Authorities (Section 725.137)</p> <p>Has the owner or operator made or attempted to make the following arrangements, as appropriate for the type of waste handled at this facility and the potential need for the services of these organizations:</p> <p>1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p>				

GEN-C-17

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
					<p>3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes _____ No <input checked="" type="checkbox"/> NA _____</p> <p>4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>NOTE: Any "N/A" answer must be explained in the Comments.</p> <p>Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart D: Contingency Plan and Emergency Procedures listed below:</p> <p>Purpose and Implementation of Contingency Plan (Section 725.151)</p> <p>Is a plan available? Yes _____ No <input checked="" type="checkbox"/></p> <p>NOTE: If answer is "No", skip to Emergency Coordinator (Section 725.155).</p>				no contingency plan

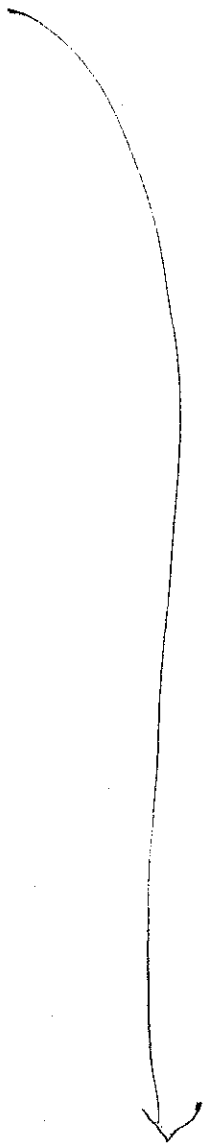
GEN-C-18

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
					<p>Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes ____ No ____</p> <p>Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes ____ No ____ N/A ____</p> <p>Content of Contingency Plan (Section 725.152)</p> <p>Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to:</p> <p>1) Fires? Yes ____ No ____</p> <p>2) Explosions? Yes ____ No ____</p> <p>3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes ____ No ____</p> <p>Does the plan describe the arrangements agreed to by:</p> <p>1) Local police and fire departments? Yes ____ No ____</p> <p>2) Hospitals? Yes ____ No ____</p> <p>3) Contractors? Yes ____ No ____</p> <p>4) State and local emergency response teams? Yes ____ No ____</p>				

GEN-C-19

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
					<p>Does the plan list the names, addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators? Yes ____ No ____</p> <p>Is the list of emergency coordinators up-to-date? Yes ____ No ____</p> <p>If more than one person is designated as an emergency coordinator, is a primary coordinator identified? Yes ____ No ____</p> <p>Does the plan identify:</p> <p>1) A list and physical description of all emergency equipment at the facility? Yes ____ No ____</p> <p>2) A brief outline of the capability of each piece of emergency equipment? Yes ____ No ____</p> <p>3) The location of each piece of emergency equipment? Yes ____ No ____</p> <p>Is the list of emergency equipment up-to-date? Yes ____ No ____</p> <p>Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes ____ No ____ N/A ____</p>				

GEN-C-20

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>Does the plan identify the signal to be used to begin evacuation? Yes _____ No _____</p> <p>Are alternate evacuation routes identified? Yes _____ No _____</p> <p>Copies of Contingency Plan (Section 725.153)</p> <p>Has a copy (and all revisions) of the contingency plan:</p> <p>a) Been maintained at the facility? Yes _____ No _____</p> <p>b) Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes _____ No _____</p> <p>Amendment of Contingency Plan (Section 725.154)</p> <p>Has the contingency plan been reviewed and, if necessary, amended whenever:</p> <p>1) Applicable regulations are revised? Yes _____ No _____</p> <p>2) The plan fails in an emergency? Yes _____ No _____ N/A _____</p>				

GEN-C-21

Area	Class	90 Day F.U. Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
					<p>3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes in the response necessary in an emergency? Yes ____ No ____ N/A ____</p> <p>4) The list of emergency coordinators changes? Yes ____ No ____</p> <p>5) The list of emergency equipment changes? Yes ____ No ____</p> <p>Emergency Coordinator (Section 725.155)</p> <p>Is there an emergency coordinator on-site or on call at all times? Yes ____ No <input checked="" type="checkbox"/></p> <p>Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout? Yes ____ No ____</p> <p>Does the coordinator have the authority to commit the resources to carry out the contingency plan? Yes ____ No ____</p>				<p>NO EC</p>

GEN-C-22

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
					<p>Emergency Procedures (Section 725.156)</p> <p>Has the facility had a release, fire or explosion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures prescribed in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column of 722.134.</p>		<input checked="" type="checkbox"/>		many releases - contamination in many areas.
			a4		<p>Has the generator complied with the requirements of 35 Ill. Adm. Code 725.116: Personnel Training listed below:</p> <p>Personnel Training (Section 725.116)</p> <p>Does the facility have a training program? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>NOTE: If "No", skip to Subsection (c)1 page GEN-C-26.</p> <p>Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Is the training program formalized, i.e., written down? Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Is the program directed by a person who has been trained in hazardous waste management procedures? Yes <input type="checkbox"/> No <input type="checkbox"/></p>				no personnel training

GEN-C-23

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
					<p>Does the program cover, at a minimum:</p> <p>1) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes ____ No ____ N/A ____</p> <p>2) Key parameters for automatic waste feed cut-off systems? Yes ____ No ____ N/A ____</p> <p>3) Communications or alarm systems? Yes ____ No ____</p> <p>4) Response to fire or explosion? Yes ____ No ____</p> <p>5) Response to groundwater contamination incidents? Yes ____ No ____ N/A ____</p> <p>Does the program cover the implementation of the contingency plan? Yes ____ No ____</p> <p>Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes ____ No ____ N/A ____</p> <p>Has the facility conducted an annual review of the initial training? Yes ____ No ____ N/A ____</p>				

GEN-C-24

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
					<p>Are the following documents and records being maintained at the facility:</p> <p>1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes ____ No ____</p> <p>2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes ____ No ____</p> <p>3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes ____ No ____</p> <p>4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes ____ No ____</p> <p>Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes ____ No ____ N/A ____</p>				

GEN-C-25

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			PART 722 GENERATOR STANDARDS Subpart D: Recordkeeping and Reporting Section 722.140: Recordkeeping Has the generator retained for a period of three years:				no manifests used none filed no analyses done
			a	- A copy of each signed manifest? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				
			b	- A copy of each annual report? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				
			b	- A copy of each exception report? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				
			c	- Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				
			d	Does a generator who is involved in any unresolved enforcement action continue to maintain the records required in 722.140(a) thru (c)? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				
			d	If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				

GEN-D-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
OTH	2				Section 722.141: Annual Reporting Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submitted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year? NOTE: A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 III. Adm. Code 702, 703, 724, 725 and 40 CFR 266.			✓	no waste shipped off site
MAN	1				Section 722.142: Exception Reporting a Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes ____ No ____ b Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes ____ No ____ b Does any exception report submitted to the Director contain the following: - A legible copy of the manifest for which the generator does not have confirmation of delivery; and			✓	

GEN-D-2

Area	Class	90 Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr	Sub Sec		Yes	No		
OTH	1				<p>- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes ____ No ____ N/A ____</p>			✓	
					<p>Section 722.143: Additional Reporting</p> <p>Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?</p>				

GEN-D-3

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Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1				PART 703 RCRA PERMIT PROGRAM Subpart C: Authorization by Rule and Interim Status Section 703.150: Application by Existing HWM Facilities and Interim Status Qualifications				
					a Has the owner or operator of an existing HWM facility or of a HWM facility in existence on the effective date of statutory or regulatory amendments that render the facility subject to the requirement to have a RCRA permit submitted Part A of the permit application to the Agency no later than the following times, whichever comes first: 1) Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725? Yes ___ No <input checked="" type="checkbox"/> N/A ___ 2) Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725? Yes ___ No <input checked="" type="checkbox"/> N/A ___ 3) By March 27, 1987 for generators who generate more than 100, but less than 1000 kg of waste in a calendar month and treat, store, or dispose of these wastes on-site? Yes ___ No ___ N/A <input checked="" type="checkbox"/>				

PER-C-1


Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			<p>Section 703.151: Application by New HWM Facilities</p> <p>For a new HWM facility, has the facility complied with the requirements of this section? Specifically, has the facility submitted Part A and Part B of the permit application 180 days before physical construction has commenced? Yes _____ No _____</p> <p>Is the facility only operating with a RCRA permit? Yes _____ No _____</p> <p>NOTE: This violation should be cited in the CIT only after receiving approval from headquarters.</p>			✓	
OTH	1			<p>Section 703.152: Amended Part A Application</p> <p>Has the owner or operator of a HWM facility with interim status filed an amended Part A permit application with the Agency:</p> <p>1) No later than the effective date of revised regulations under 35 Ill. Adm. Code 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling? Yes _____ No _____ N/A _____</p> <p>2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes _____ No _____ N/A _____</p> <p>NOTE: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.</p>			✓	no Part A

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			<p>Section 703.154: Prohibitions During Interim Status</p> <p>During interim status, has the facility refrained from:</p> <p>a - Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes ____ No <input checked="" type="checkbox"/></p> <p>b - Employing processes not specified in Part A of the permit application? Yes ____ No ____</p> <p>c - Exceeding the design capacities specified in Part A of the permit application? Yes ____ No ____</p>				
OTH	1			<p>Section 703.155: Changes During Interim Status</p> <p>NOTE: Section 703.155(a), (b) and (c) reiterate in more detail the requirement that a HWM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section.</p> <p>d Did the owner or operator submit a revised Part A permit application not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes ____ No ____ N/A ____</p>				

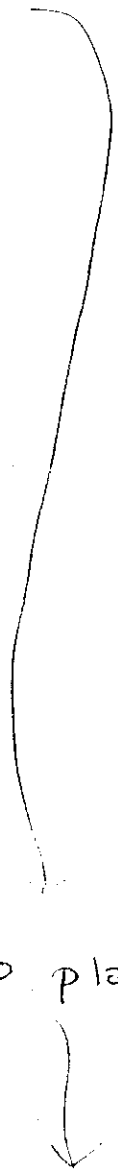
PER-C-3

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart A: General Provisions			✓	
				Section 725.101: Purpose, Scope and Applicability Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes _____ No <u>✓</u> <u>NOTE:</u> If "Yes", explain in narrative. d Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101(d)? Yes _____ No <u>N/A</u> ✓				

TSD-A-1

Area	Class	90 Day F U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart B: General Facility Standards				USEPA assigned ID# number because they consider them a disposal facility, but no ID# was ever filed.
OIH	1			Section 725.111: USEPA Identification Number Has the facility obtained a USEPA identification number?		✓		
OTH	1			Section 725.112: Required Notices a Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes _____ No _____ N/A ✓			✓	
				b Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes _____ No _____ N/A ✓				
OTH	1			Section 725.113: General Waste Analysis a1 Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes _____ No ✓		✓		no analyses 

TSD-B-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			a1	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes ____ No <input checked="" type="checkbox"/>				 no plan
			a3	Has the analysis been repeated: A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes ____ No ____ N/A ____ B) By off-site facilities, when the results of the inspection required in Section 725.113(a)(4) indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper? Yes ____ No ____ N/A ____				
			a4	Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				
			b	Has the owner or operator developed a written analysis plan? Yes ____ No <input checked="" type="checkbox"/>				
				<p>NOTE: If "No", skip to 725.114.</p> <p>Is the written waste analysis plan available at the facility? Yes ____ No ____</p>				

TSD-B-2

Area	Class	90 Day F U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Does the owner or operator follow the procedures in the written plan so as to comply with the requirements in Section 725.113(a)? Yes _____ No _____</p> <p>b Does the plan specify:</p> <p>1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters? Yes _____ No _____</p> <p>2) The test methods which will be used to test for those parameters? Yes _____ No _____</p> <p>3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes _____ No _____</p> <p>4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date? Yes _____ No _____</p> <p>5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes _____ No _____</p>				


TSD-B-3

Area	Class	90 Day F-U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
					<p>6) The methods which will be used to meet the additional analysis requirements for specific waste management methods as specified in Sections:</p> <ul style="list-style-type: none"> - 725.293 (Tanks); - 725.325 (Surface Impoundments); - 725.352 (Waste Piles); - 725.373 (Land Treatment); - 725.414 (Incinerators); - 725.475 (Thermal Treatment); - 725.502 (Chem. Phys. Bio. Treat.) <p>Yes _____ No _____ N/A _____</p> <p>NOTE: Circle the specific waste management methods being employed.</p> <p>c For off-site facilities, does the plan:</p> <p>1) Describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? Yes _____ No _____ N/A _____</p> <p>2) Describe the sampling methods which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling? Yes _____ No _____ N/A _____</p> <p>Section 725.114: Security</p> <p>Does the facility qualify for the exemption to the requirement to provide security provided in Section 725.114(a)? Yes _____ No <input checked="" type="checkbox"/></p>				
OTH	1	X						<input checked="" type="checkbox"/>	

TSD-B-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Does a non-exempt facility have either:</p> <p>b 1) A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility? Yes No <input checked="" type="checkbox"/></p> <p style="text-align: center;">OR</p> <p>b 2) An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry at all times thru the gate(s) or other entries to the active portion of the facility? Yes <input checked="" type="checkbox"/> No </p> <p>c Does a non-exempt facility have a sign, legible from a distance of at least 25 feet, with the words "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion? Yes No <input checked="" type="checkbox"/></p> <p>NOTE: Existing signs with legends other than the one above may be used if the legend on the sign indicates only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be dangerous.</p>				

TSD-B-5

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			Section 725.115: General Inspection Requirements		<input checked="" type="checkbox"/>		no schedule 
			a	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to:				
				1) Release of hazardous waste or hazardous waste constituents to the environment; or a threat to human health? Yes ___ No <input checked="" type="checkbox"/>				
			a	Does the owner or operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment? Yes ___ No <input checked="" type="checkbox"/>				
			b1	Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Yes ___ No <input checked="" type="checkbox"/>				
			b2	Is the written schedule at the facility? Yes ___ No ___				
			b3	Does the schedule identify the types of problems which are to be looked for during the inspection? Yes ___ No ___				
			b4	Does the schedule specify at least the following minimum inspection frequency:				
				- Daily inspections of areas subject to spills? Yes ___ No ___				

TSD-B-6

Area	Class	90 Day F-U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr	Sub Sec		Yes	No		
					<p>- The items and frequencies, where applicable, called for in Sections:</p> <ul style="list-style-type: none"> - 725.274 (Containers); - 725.294 (Tanks); - 725.326 (Surface Impoundments); - 725.447 (Incinerators); - 725.477 (Thermal Treatment); - 725.503 (Chem. Phys. Bio. Treat.) <p>Yes _____ No _____ N/A _____</p> <p>NOTE: Circle the applicable section.</p> <p>c Has the owner or operator remedied any deterioration or malfunction of equipment or structures which the inspections reveal on a schedule which ensures that the problem does not lead to an environmental or human health hazard? Yes _____ No <input checked="" type="checkbox"/></p> <p>c Where a hazard is imminent or has already occurred, has the owner or operator taken immediate action to resolve the problem? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>d Does the owner or operator record the results of inspections in a log or summary? Yes _____ No <input checked="" type="checkbox"/></p> <p>d Does the inspection record include:</p> <ul style="list-style-type: none"> - The date and time of the inspection? Yes _____ No _____ - The name of the inspector? Yes _____ No _____ 				<p>no records</p>



TSD-B-7

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	2				<ul style="list-style-type: none"> - A notation of the observations made? Yes ____ No ____ - The date and nature of any type of corrective action? Yes ____ No ____ N/A ____ 				<p>↓</p> <p>no training</p> <p>↓</p>
					<p>Section 725.116: Personnel Training</p> <p>Does the facility have a training program? Yes ____ No <input checked="" type="checkbox"/></p> <p>NOTE: If "No", skip to Section 725.117, Page TSD-B-10.</p> <p>a1 Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes ____ No ____</p> <p>Is the training program formalized, i.e., written down? Yes ____ No ____</p> <p>a2 Is the program directed by a person who has been trained in hazardous waste management procedures? Yes ____ No ____</p> <p>a3 Does the program cover, at a minimum:</p> <p>A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes ____ No ____ N/A ____</p>		<input checked="" type="checkbox"/>		

TSD-B-8

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>B) Key parameters for automatic waste feed cutoff systems? Yes ____ No ____ N/A ____</p> <p>C) Communications or alarm systems? Yes ____ No ____ N/A ____</p> <p>D) Response to fire or explosion? Yes ____ No ____ N/A ____</p> <p>E) Response to ground water contamination incidents? Yes ____ No ____ N/A ____</p> <p>Does the program cover the implementation of the contingency plan? Yes ____ No ____</p> <p>b Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes ____ No ____ N/A ____</p> <p>c Has the facility conducted an annual review of the initial training? Yes ____ No ____ N/A ____</p> <p>d Are the following documents and records being maintained at the facility:</p> <p>1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes ____ No ____</p>				

TSD-B-9

Area	Class	90 Day F U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr	Sub Sec		Yes	No		
OTH	1	X			2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes ____ No ____				
					3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes ____ No ____				
					4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes ____ No ____				
					e Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes ____ No ____ N/A ____				
					Section 725.117: General Requirements for Ignitable, Reactive or Incompatible Wastes				
					a Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes ____ No ____				Undetermined if such wastes are generated. 
				a Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes ____ No ____					

TSD-B-10

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			a	Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste? Yes ____ No ____				
			b	Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or comingling of incompatible wastes and materials being done so that it does not:				
				1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes ____ No ____				
				2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes ____ No ____				
				3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes ____ No ____				
				4) Damage the structural integrity of the device or facility containing the waste? Yes ____ No ____				
				5) Through other like means threaten human health or the environment? Yes ____ No ____				


ISD-8-11

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Section 725.118: Location Standards</p> <p>Has the facility placed hazardous waste in a salt dome, salt bed formation, underground mine or cave after July 11, 1986?</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>NOTE: A "Yes" answer is a violation of the location standard.</p>				

TSD-B-12

Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart C: Preparedness and Prevention Section 725.131: Maintenance and Operation of Facility Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to: <ul style="list-style-type: none"> - Air; - Soil; or - Surface water, which would threaten human health or the environment? Yes ____ No <input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
OTH	1	X		Section 725.132: Required Equipment Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment: <ul style="list-style-type: none"> - An internal communications or alarm system capable of providing immediate emergency instructions? Yes ____ No <input checked="" type="checkbox"/> N/A ____ - A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes ____ No <input checked="" type="checkbox"/> N/A ____ 		<input checked="" type="checkbox"/>		
			a					
			b					

TSD-C-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X	c	<ul style="list-style-type: none"> - Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> 				no such equipment 
			d	<ul style="list-style-type: none"> - Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> <p>NOTE: Any "N/A" answers must be explained in the Remarks column.</p> <p>Section 725.133: Testing and Maintenance of Equipment</p> <p>Where required, is the facility testing and maintaining, as necessary, to assure proper operation in time of emergency:</p> <ul style="list-style-type: none"> - Communications/alarm systems? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - Fire protection equipment? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - Spill control equipment? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - Decontamination equipment? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <p>NOTE: Any "N/A" answer must be explained in the Comments.</p>				

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		Section 725.134: Access to Communications or Alarm Systems a Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 725.132? Yes ____ No <input checked="" type="checkbox"/> N/A ____ b If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes ____ No ____ N/A <input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
OTH	1	X		Section 725.135: Required Aisle Space Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?		<input checked="" type="checkbox"/>		
OTH	2			Section 725.137: Arrangements with Local Authorities a Has the owner or operator made or attempted to make the following arrangements as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:		<input checked="" type="checkbox"/>		

TSD-C-3

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
					<p>1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes? Yes ____ No <input checked="" type="checkbox"/> N/A ____</p> <p>2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority? Yes ____ No <input checked="" type="checkbox"/> N/A ____</p> <p>3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes ____ No <input checked="" type="checkbox"/> N/A ____</p> <p>4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes ____ No <input checked="" type="checkbox"/> N/A ____</p> <p>NOTE: Any "N/A" answer must be explained in the Comments.</p> <p>b Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>				

TSD-C-4

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Ser		Yes	No		
OTH	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart D: Contingency Plan and Emergency Procedures				no plan
				Section 725.151: Purpose and Implementation of Con- tingency Plan				
			a	Is a plan available? Yes _____ No <u>✓</u>				
				NOTE: If the answer is "No", skip to 725.155.				
			a	Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface waters? Yes _____ No _____				
			b	Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes _____ No _____ N/A _____				
OTH	2			Section 725.152: Content of Contingency Plan				
			a	Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to:				
				1) Fires? Yes _____ No _____				
				2) Explosions? Yes _____ No _____				


TSD-D-1

Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes ____ No ____</p> <p>c Does the plan describe the arrangements agreed to by:</p> <p>1) Local police and fire departments? Yes ____ No ____</p> <p>2) Hospitals? Yes ____ No ____</p> <p>3) Contractors? Yes ____ No ____</p> <p>4) State and local emergency response teams? Yes ____ No ____</p> <p>d Does the plan list the names, addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators? Yes ____ No ____</p> <p>d Is the list of emergency coordinators up-to-date? Yes ____ No ____</p> <p>d If more than one person is designated as an emergency coordinator is a primary coordinator designated? Yes ____ No ____</p> <p>e Does the plan identify:</p> <p>1) A list and physical description of all emergency equipment at the facility? Yes ____ No ____</p>				

TSD-D-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No		
			Sub Sec		Yes	No				
OTH	2			2) A brief outline of the capability of each piece of emergency equipment? Yes ____ No ____						
				3) The location of each piece of emergency equipment? Yes ____ No ____						
			e	Is the list of emergency equipment up-to-date? Yes ____ No ____						
			f	Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes ____ No ____ N/A ____						
			f	Does the plan identify the signal to be used to begin evacuation? Yes ____ No ____						
			f	Are alternate evacuation routes identified? Yes ____ No ____						
			Section 725.153: Copies of Contingency Plan							
			a	Has a copy (and all revisions) of the contingency plan:						
			a)	Been maintained at the facility? Yes ____ No ____						
			b	b) Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes ____ No ____						

TSD-D-3

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
OTH	2				725.154: Amendment of Contingency Plan Has the contingency plan been reviewed and, if necessary, amended whenever: a 1) Applicable regulations are revised? Yes ____ No ____ b 2) The plan fails in an emergency? Yes ____ No ____ N/A ____ c 3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes ____ No ____ N/A ____ d 4) The list of emergency coordinators changes? Yes ____ No ____ e 5) The list of emergency equipment changes? Yes ____ No ____			✓	
OTH	2				Section 725.155: Emergency Coordinator Is there an emergency coordinator on-site or on-call at all times? Yes ____ No <input checked="" type="checkbox"/>		✓	no EC	

TSD-D-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1/2			<p>Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout?</p> <p>Yes _____ No _____</p> <p>Does the coordinator have the authority to commit the resources to carry out the contingency plan?</p> <p>Yes _____ No _____</p> <p>Section 725.156: Emergency Procedures</p> <p>Has the facility had a release, fire or explosion?</p> <p>Yes <input checked="" type="checkbox"/> No _____</p> <p>NOTE: If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures described in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column.</p>				<p>1) Release of red waste material into drains which lead to sewer.</p> <p>2) Release from "tank" (Bld. G + F) into Bld. P</p> <p>No action taken for either incident.</p>

TSD-D-5

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart E: Manifest System, Recordkeeping and Reporting Section 725.171: Use of Manifest System Does the facility accept waste from off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				Accepted to les w/waste in the past. waste is still on site NO manifests used
				NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.173.				
				For each manifest reviewed, did the facility:				
			a1	1) Sign and date each copy to certify that the hazardous waste covered by the manifest was received? Yes <input type="checkbox"/> No <input type="checkbox"/>				
			a2	2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			a3	3) Immediately give one copy of the completed manifest to the transporter? Yes <input type="checkbox"/> No <input type="checkbox"/>				
a4	4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes <input type="checkbox"/> No <input type="checkbox"/>							
a5	5) Retain a copy of the manifest at the facility for a period of three years from the date of delivery of the waste? Yes <input type="checkbox"/> No <input type="checkbox"/>							

TSD-E-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	2		b	<p>Has the facility followed the procedures prescribed in 725.171(b) for rail or water (bulk shipments) of hazardous waste? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>Does the facility initiate shipments of hazardous waste? Yes ____ No <input checked="" type="checkbox"/></p> <p>NOTE: If the answer is "Yes", the facility is also a generator of hazardous waste. Complete the generator checklist.</p> <p>Section 725.172: Manifest Discrepancies</p> <p>NOTE: If there are no manifest discrepancies, mark the "N/A" column.</p>			<input checked="" type="checkbox"/>	no manifests.
			b	<p>Has the owner or operator attempted to resolve significant discrepancies in quantity or type (i.e., variations in weight of 10% or more, variations in piece count of one container per truckload, obvious differences which can be discovered by inspection or waste analysis such as waste solvent substituted for waste acid) upon their discovery? Yes ____ No ____</p>				
			d	<p>If the discrepancy is not resolved within 15 days after receiving the waste, has the owner or operator submitted to the Agency a letter describing the discrepancy and the attempts made to reconcile it and a copy of the manifest or shipping paper at issue? Yes ____ No ____</p>				

TSD-E-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			Section 725.173: Operating Record		<input checked="" type="checkbox"/>		no operating record
			a	Does the owner or operator have a written operating record at the facility? Yes ____ No <input checked="" type="checkbox"/>				
			b	Is the information in the operating record being maintained until closure of the facility? Yes ____ No ____				
			b	Does the operating record contain the following information: 1) A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes ____ No ____ 2) A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes ____ No ____ 3) The location of each hazardous waste within the facility? Yes ____ No ____ 4) The quantity of each hazardous waste at each location within the facility? Yes ____ No ____ 5) For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes ____ No ____ N/A ____				

TSD-E-3

Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>6) A cross reference by manifest number to location and quantity of hazardous waste? Yes _____ No _____ N/A _____</p> <p>7) Records and results of waste analyses and trial test performed as specified in Sections:</p> <ul style="list-style-type: none"> - 725.113 (Gen. Waste Analysis)? Yes _____ No _____ - 725.293 (Tanks)? Yes _____ No _____ N/A _____ - 725.325 (Surface Improvements)? Yes _____ No _____ N/A _____ - 725.352 (Waste Piles)? Yes _____ No _____ N/A _____ - 725.373 (Land Treatment)? Yes _____ No _____ N/A _____ - 725.441 (Incinerators)? Yes _____ No _____ N/A _____ - 725.475 (Thermal Treatment)? Yes _____ No _____ N/A _____ - 725.502 (Chem., Phys., Bio. Treatment)? Yes _____ No _____ N/A _____ <p>8) Summary reports and details of all incidents that require the implementation of the contingency plan as specified in Section 725.156(j)? Yes _____ No _____ N/A _____</p>				

TSD-E-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>9) Records and results of inspections as required by Section 725.115(d)? Yes _____ No _____</p> <p>NOTE: The above information on inspection records need only be kept for three years. This period would automatically be extended during any unresolved enforcement action.</p> <p>10) Monitoring, testing or analytical data where required by Sections:</p> <ul style="list-style-type: none"> - 725.190 (G.W. Monitoring)? Yes _____ No _____ N/A _____ - 725.194 (G.W. Monitoring)? Yes _____ No _____ N/A _____ - 725.376 (Land Treatment)? Yes _____ No _____ N/A _____ - 725.378 (Land Treatment)? Yes _____ No _____ N/A _____ - 735.380(d)(1) (Land Treatment)? Yes _____ No _____ N/A _____ - 725.447 (Incinerators)? Yes _____ No _____ N/A _____ - 725.477 (Thermal Treatment)? Yes _____ No _____ N/A _____ <p>NOTE: Data required under 725.194 must be kept throughout the post-closure period.</p>				

TSD-E-5

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	2				Section 725.175: Annual Report Has the owner or operator prepared and submitted a copy of a facility annual report, supplied by the Agency, to the Agency by March 1 of each year for the preceding calendar year?		<input checked="" type="checkbox"/>		Have accepted totes filled w/waste in the past. Waste Material is still on-site
OTH	1				Section 725.176: Unmanifested Waste Report Does the facility accept hazardous waste from off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.177. Has the facility accepted hazardous waste from an off-site source for treatment, storage or disposal without an accompanying manifest or shipping paper? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 Ill. Adm. Code 721.105? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NOTE: If the answer to both the above questions is "Yes", check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions: Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		




TSD-E-7

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			<p>Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste? Yes ____ No <input checked="" type="checkbox"/></p> <p>Section 725.177: Additional Reports</p> <p>Has the owner or operator submitted to the Agency, as required, reports concerning:</p>				
			a	<p>1) Releases, fires, explosions as specified in Section 725.156? Yes ____ No <input checked="" type="checkbox"/> N/A ____</p>		<input checked="" type="checkbox"/>		
			b	<p>2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>				
			c	<p>3) Facility closure as specified in Section 725.215? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>				

TSD-E-8

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subparts G and H: Closure, Post-Closure and Financial Requirements				no closure plan
			a	Section 725.212: Closure Plan Was the most current facility closure plan available during the inspection? Yes _____ No <input checked="" type="checkbox"/> Was the closure plan submitted to the Agency within the time frames specified below: <ul style="list-style-type: none"> - At least 180 days prior to the date closure of the first surface impoundment, waste pile, land treatment or landfill unit was (is) expected to begin? Yes _____ No _____ N/A _____ - At least 180 days prior to the date of final closure of a facility with surface impoundment(s), waste pile(s), land treatment or landfill unit(s)? Yes _____ No _____ N/A _____ - At least 45 days prior to the date of final closure of a facility with any tank(s), container storage or incinerator unit(s)? Yes _____ No _____ N/A _____ - At least 60 days prior to the date closure is expected to begin at a facility with a surface impoundment, waste pile, landfill or land treatment unit which also has an approved closure plan? Yes _____ No _____ N/A _____ 		<input checked="" type="checkbox"/>		

TSD-G/H-1

Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr		Sub Sec	Yes		
CLO	1		a	<ul style="list-style-type: none"> - No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes ____ No ____ N/A ____ - No later than 15 days after issuance of a judicial decree or Board Order to cease receiving hazardous waste or close? Yes ____ No ____ N/A ____ 				 none necessary
				Section 725.218: Post-Closure Plan				
				Was the most current facility post-closure plan available during the inspection? Yes ____ No ____ Was the post-closure plan submitted to the Agency within the time frames established in this sub-section? Yes ____ No ____ N/A ____				
FIN	1			Section 725.242: Cost Estimate for Closure				 none necessary
				Has the facility prepared a written estimate of the cost of closing the facility?				
FIN	1			Section 725.244: Cost Estimate for Post-Closure Care				 none necessary
				Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility?				
				NOTE: If no post-closure plan, mark "N/A".				


TSD-G/H-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart I: Use and Management of Container Section 725.271: Condition of Containers Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part?		<input checked="" type="checkbox"/>		
OTH	1	X		Section 725.272: Compatibility of Waste with Containers Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired?	<input checked="" type="checkbox"/>			
OTH	1	X		Section 725.273: Management of Containers Are containers of hazardous waste always closed during storage? Yes _____ No <input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
			a	Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes _____ No <input checked="" type="checkbox"/>				
OTH	2			Section 725.274: Inspections Is the owner or operator inspecting areas where the containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes _____ No <input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
			b					


TSD-I-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		<p>NOTE: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc. to determine if inspections are actually being done.</p> <p>Section 725.276: Special Requirements for Ignitable or Reactive Wastes</p> <p>Are containers holding ignitable or reactive waste located at least 50 feet from the property line?</p>	✓			
				<p>Section 725.277: Special Requirements for Incompatible Wastes</p> <p>Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section?</p>			✓	

TSD-I-2


Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart J: Tank Systems Section 725.290: Applicability Does the facility store or treat hazardous waste in tanks? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If "No", skip Subpart J. <u>NOTE:</u> Tanks or sump pits that serve as part of a second- ary containment system to collect or contain releases are not subject to Subpart J requirements. Will the waste stored in the tanks fail the filter test and are the tanks located inside a building with an impermeable floor? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <u>NOTE:</u> Failing the filter test means that the waste contains free liquids. Section 725.291: Assessment of Existing Tank Systems				
			a	For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <u>NOTE:</u> Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.				no assessments 

TSD-J-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1		b	<p>Does this assessment consider at least the following:</p> <ol style="list-style-type: none"> 1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection, or other tank integrity examination? Yes ____ No ____ <p>Section 725.292: Design and Installation of New Tank Systems or Components</p>				
			a	<p>For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared? Yes ____ No ____</p> <p>Does the assessment include, at a minimum, the following:</p> <ol style="list-style-type: none"> 1) design standards for tanks and ancillary equipment; <p>NOTE: These standards should include protection from damage from vehicular traffic, adequate foundations, anchoring to prevent flotation or dislodgement, and withstanding the effects of frost heave.</p> <ol style="list-style-type: none"> 2) hazardous characteristics of the waste; and 3) evaluation of potential for corrosion and corrosion protection measures? Yes ____ No ____ 				

TSD-J-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH			g	Has the owner obtained and kept on file at the facility the certifications of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____				no secondary containment
				Section 725.293: Containment and Detection of Releases		✓		
			a1	Is secondary containment provided for any new tank system (constructed after 7/14/86) before being put into service? Yes _____ No _____ N/A ✓				
			a2	Does an existing tank, which stores F020, F021, F022, F023, F026 or F027 waste(s) have secondary containment (secondary containment is required by January 12, 1989)? Yes _____ No _____ N/A ✓				
			a3	For an existing tank, of known age, which stores any hazardous waste, is secondary containment provided (secondary containment is required by January 12, 1989 or when the tank is 15 years old, whichever is later)? Yes _____ No _____ N/A ✓				
			a4	For an existing tank of unknown age, has secondary containment been provided by January 12, 1995? Yes _____ No _____ N/A ✓ <u>or</u> If the facility is older than 7 years, by the time the facility reaches 15 years of age or January 12, 1989, whichever is later? Yes _____ No ✓ N/A _____				
			a5	For tanks that store wastes that are listed as hazardous after 1/12/87, has secondary containment been provided on the same basis as required in Subsections (a)(1) through (a)(4) of 725.293 substituting the date that a material becomes a hazardous waste for 1/12/87? Yes _____ No _____ N/A ✓				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			b1&2	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes out of the system, and capable of detecting and collecting releases? Yes ____ No ____ N/A ____</p> <p>NOTE: To meet the requirements of Subsection (b) secondary containment must comply with the physical requirements given in Subsection (c)(1) through (4) (compatible liner, foundation, leak detection system).</p>				
			c4	<p>Is spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours? Yes ____ No ____ N/A ____</p> <p>NOTE: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>				
			d	<p>Does the secondary containment have one or more of the following:</p> <ul style="list-style-type: none"> 1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? <p>Yes ____ No ____ N/A ____</p> <p>NOTE: Liners, vaults or double-walled tanks must also comply with the requirements of Section 725.293, Subsection (e) or "No" should be marked and explained in the comment.</p>				
			f	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for:</p>				

TSD-J-4

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
					1) above ground piping (exclusive of flanges, joints, valves and connections) that are inspected daily; 2) welded flanges, joints and connections that are inspected daily; 3) sealless or magnetic coupling pumps that are inspected daily; and 4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? Yes _____ No _____ N/A _____				↓
			i		Until such time as secondary containment is provided, are the following requirements being met for all tank systems: 1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)? Yes _____ No <input checked="" type="checkbox"/> N/A _____				


TSD-J-5

Area	Class	30 Day FU Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>If a tank or secondary containment system has leaked, has the owner done the following:</p> <p>a 1) Ceased using, stopped inflow of wastes? Yes ___ No <input checked="" type="checkbox"/></p> <p>b 2) Removed the waste from the tank system within 24 hours and/or from the secondary containment system within 24 hours? Yes ___ No <input checked="" type="checkbox"/></p> <p>3) Taken actions to prevent waste migration and removed and properly disposed of visibly contaminated soil or subsurface water? Yes ___ No <input checked="" type="checkbox"/></p> <p>d 4) Reported to the Agency within 24 hours of detection? Yes ___ No <input checked="" type="checkbox"/></p> <p>NOTE: Reporting to the Agency is <u>not</u> necessary if less than one pound of material which was <u>immediately</u> contained and cleaned up was spilled.</p> <p>5) Within 30 days of detection of a release, submitted a report to the Agency that complies with Section 725.296(d)(3)(A) through (E)? Yes ___ No <input checked="" type="checkbox"/></p> <p>e4 If the source of the release was from a component of a tank system without secondary containment, has the owner provided secondary containment (that satisfies 725.293) to the component of the system before it is returned to service? Yes ___ No ___ N/A <input checked="" type="checkbox"/></p> <p>NOTE: If the component is above ground and can be visually inspected then secondary containment is not needed.</p>				


TSD-J-7

Area	Class	90 Day F U Req	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
				Yes	No		
OTH	1	X	Section 725.294: General Operating Requirements b1 Are tanks equipped with spill prevention controls (e.g., check valves, dry disconnect couplings) and overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank)? Yes _____ No <input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
			b3 Is a sufficient freeboard being maintained in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes _____ No _____ N/A <input checked="" type="checkbox"/>				
			c If a leak or spill has occurred in the tank system, has the owner or operator complied with the requirements of 725.296? Yes _____ No <input checked="" type="checkbox"/> N/A _____				
OTH	2		Section 725.295: Inspections c Is the facility operator inspecting and documenting, in an operating record, the results of tank inspection as required in 725.295, Subsections (a) and (b)? Yes _____ No <input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
OTH	1	X	Section 725.296: Response to Leaks or Spills and Disposition of Tank Systems Does the facility have a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use? Yes <input checked="" type="checkbox"/> No _____ NOTE: If "No", skip to Section 725.297. If "Yes", answer the following questions. If there is a violation of the requirements in this section, there is also a violation of Section 725.294(c).		<input checked="" type="checkbox"/>		

TSD-J-6

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1		f	<p>Certification of major repairs. If an extensive repair has been done, then is a certification by an independent, registered professional engineer, that the repaired system is capable of handling hazardous waste available before the tank is returned to service?</p> <p>Yes ___ No ___ N/A <input checked="" type="checkbox"/></p> <p>Has the certification been submitted within 7 days after returning the tank system to use?</p> <p>Yes ___ No ___ N/A <input checked="" type="checkbox"/></p> <p>Section 725.297: Closure and Post Closure Care</p> <p>NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Section 725.298.</p>				<p>no closure is being performed</p> 
			a	<p>At the time of closure, has the owner removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste (unless 721.103(d) applies)?</p> <p>Yes ___ No ___</p>				
			a	<p>Has the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H?</p> <p>Yes ___ No ___</p>				
			b	<p>If contaminated soils are <u>not</u> removed, then has the tank system performed closure and post closure care in accordance with requirements applicable to landfills (Section 725.410)?</p> <p>Yes ___ No ___</p> <p>NOTE: Such a tank system is considered a "Landfill" and shall meet all of the requirements of landfills specified in Subparts G and H.</p>				

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Area	Class	90 Day F U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
OTH	1				Section 725.298: Special Requirements for Ignitable or Reactive Wastes Are ignitable or reactive wastes stored in tanks? Yes ____ No ____ NOTE: If "No", skip to Section 725.299. a If ignitable or reactive wastes are stored or treated in tanks, then is it in such a way that the waste is protected from material or conditions that may cause it to ignite or react? Yes ____ No ____ NOTE: Tank systems used solely for emergencies may store ignitable/reactive wastes. b Are there proper protective distances between the waste management area and the facility boundary line? Yes ____ No ____				Undetermined 
OTH	1				Section 725.299: Special Requirements for Incompatible Wastes Is Section 725.117 being complied with whenever incompatible wastes are stored in the same tank system or in a tank system which has not been decontaminated? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				

TSD-J-9

Area	Class	90 Day FUI Req	Key Ltr	Requirement	In Apparent Compliance		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			Section 725.300: Waste Analysis and Trial Tests In addition to complying with 725.113, whenever a tank is used to treat chemically or to store a hazardous waste that is substantially different than that waste previously stored, or to treat chemically a hazardous waste with a substantially different process, then has the owner:			✓	
			a	1) Conducted a waste analysis and trial treatment or storage tests? Yes ____ No ____ N/A ____ or				
			b	2) Obtained written, documented information to show that the proposed treatment or storage will meet the requirements of 725.294(a)? Yes ____ No ____ N/A ____ NOTE: Section 725.301: Generators of 100 to 1000 kg/mo. is included in the checklist for Reduced Requirement Generators.				

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
LAND POLLUTION CONTROL/FOS
VIOLATION CORRELATION SHEET**

*Cited
11-24-92*

VIOLATIONS	SUMMARY OF VIOLATIONS		NARRATIVE	INSPECTION CHECKLIST	PECL/CIL	COMMENTS
<u>Outstanding</u> 722.111	CCR1	X	X	X	X	IWI must make a waste determination on any materials which appear to be waste
The following violations may be applicable based on the waste determination						
722.111(a)	CCR1	X	X		N/A	Generator has not obtained a USLEPA ID # (no 8700-12 form submitted)
722.111(b)	GPI	X	X		N/A	Have not complied w/725 Subpart 18(d) (no dates, labels, etc.)
(725.271)	DMC1	X	X	X	N/A	Containers are in bad condition and are leaking
(725.273a)	DMC1	X	X	X	N/A	Containers must always be closed during storage
(725.273b)	DMC1	X	X	X	N/A	Containers are stored and handled which may rupture the container or cause leaking
(725.274)	DMC2	X	X	X	N/A	No inspections of containers are being conducted
(725.291a)	DIR1	X	X	X	N/A	No independent, certified, written assesment of tanks is available
(725.293a)	DIR1	X	X	X	N/A	No secondary containment has been provided for the three tanks on-site
(725.294)	DIR1	X	X	X	N/A	No spill prevention controls on tanks
(725.295a)	DIR2	X	X	X	N/A	No tank inspections are being conducted
(725.295b)	DIR2	X	X	X	N/A	No documentation of inspections in operating record
(725.296)	DIR1	X	X	X	N/A	Tanks which have had leaks or spills must be removed from service immediately
(725.296d)	DIR1	X	X	X	N/A	Release was not reported to the Agency
(725.131)	DPP1	X	X	X	N/A	Facility is not maintained to minimize the the possibility of releases of haz waste
(725.132)	DPP1	X	X	X	N/A	No required equip: internal, external alarms, fire, spill, or decon equipment
(725.134)	DPP1	X	X	X	N/A	No immediate access to alarm or emergency communication devise
(725.135)	DPP1	X	X	X	N/A	Inadequate aisle space
(725.137)	DPP2	X	X	X	N/A	No arrangements with local authorities
(725.151a)	DCP1	X	X	X	N/A	No contingency plan

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
LAND POLLUTION CONTROL/FOS**

VIOLATION CORRELATION SHEET

VIOLATIONS	SUMMARY OF VIOLATIONS	NARRATIVE	INSPECTION CHECKLIST	PECL/CIL	COMMENTS
(725.115)	DGP2 X	X	X	N/A	No emergency coordinator
(725.116a) (1)	DGP1 X	X	X	N/A	No action taken upon release of waste
(725.116a)	DGS1 X	X	X	N/A	No personnel training
(725.116d)	DGS2 X	X	X	N/A	No documentation of personnel training
705.150a	DOR1 X	X	X	N/A	No Part A submitted
725.111	DGS1 X	X	X	N/A	Facility owner must apply for a USEPA ID# (no 8700-12 form submitted)
725.113a	DGS1 X	X	X	N/A	No waste analysis provided before storage
725.113b	DGS1 X	X	X	N/A	No written waste analysis plan
725.114c	DGS1 X	X	X	N/A	No "Danger-Unauthorized Personnel Keep Out" sign posted near storage areas
725.115a	DGS2 X	X	X	N/A	No inspections
725.115b	DGS2 X	X	X	N/A	No written inspection schedule
725.115c	DGS2 X	X	X	N/A	No remediation of deteriorations
725.115d	DGS2 X	X	X	N/A	No inspection log or summary
725.116a	DGS1 X	X	X	N/A	No personnel training
725.116d	DGS2 X	X	X	N/A	No documentation of personnel training
725.131	DPP1 X	X	X	N/A	Facility is not maintained to minimize the the possibility of releases of haz waste
725.132	DPP1 X	X	X	N/A	No required equipment: internal, external alarms, fire, spill, decon equipment
725.134	DPP1 X	X	X	N/A	No immediate access to alarm or emergency communication device
725.135	DPP1 X	X	X	N/A	Inadequate aisle space
725.137	DPP2 X	X	X	N/A	No arrangements with local authorities

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
LAND POLLUTION CONTROL/FOS

VIOLATION CORRELATION SHEET

VIOLATIONS	SUMMARY OF VIOLATIONS	NARRATIVE	INSPECTION CHECKLIST	PECL/CIL	COMMENTS
725.15(h)	DCP 1	X	X	N/A	No contingency plan
725.175	DCP 2	X	X	N/A	No emergency coordinator
725.150(a)(ii)	DCP 1	X	X	N/A	No action taken upon release of waste
725.123	DMR 2	X	X	N/A	No operating record
725.174(a)	DMR 2	X	X	N/A	No records were available at time of inspection
725.125	DMR 2	X	X	N/A	No facility annual report submitted
725.176	DMR 1	X	X	N/A	Accepted haz waste w/out a manifest (no unmanifested waste report filed)
725.177	DMR 2	X	X	N/A	No reports regarding releases have been submitted to the Agency
725.212(a)	DCL 1	X	X	N/A	No closure plan
725.242(a)	DER 1	X	X	N/A	No written closure cost estimate
725.271	DMC 1	X	X	N/A	Containers are in bad condition and are leaking
725.273(a)	DMC 1	X	X	N/A	Containers must always be closed during storage
725.273(b)	DMC 1	X	X	N/A	Containers are stored and handled which may rupture the container or cause leaking
725.274	DMC 2	X	X	N/A	No inspections of containers are being conducted
725.291(a)	DTR 1	X	X	N/A	No independent, certified, written assesment of tanks is available
725.293(a)	DTR 1	X	X	N/A	No secondary containment has been provided for the three tanks on-site
725.294	DTR 1	X	X	N/A	No spill prevention controls on tanks
725.295(a)	DTR 2	X	X	N/A	No tank inspections are being conducted
725.295(c)	DTR 2	X	X	N/A	No documentation of inspections in operating record
725.296	DTR 1	X	X	N/A	Tanks which have had leaks or spills must be removed from service immediately
725.296(d)	DTR 1	X	X	N/A	Release was not reported to the Agency

